

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
SES AMERICOM, INC.	)	File No. SAT-STA-_____
	)	Call Sign S2713
Request for Special Temporary Authority to	)	
Relocate the AMC-18 Fixed-Satellite Space	)	
Station to, and Operate it at, 139° W.L.	)	

*Expedited Action Requested*

**REQUEST OF SES AMERICOM, INC.**

SES Americom, Inc. (“SES Americom” or “SES”) respectfully requests special temporary authority (“STA”) for a period of 60 days beginning no later than January 12, 2018, to permit SES to relocate the AMC-18 C-band fixed-satellite space station from 104.95° W.L., where it has been operating under a Gibraltar license, to 139° W.L., and to operate the satellite thereafter pursuant to U.S. authority. Specifically, SES seeks authority to: (1) drift AMC-18 from its current position at 104.95° W.L. to 139° W.L. and maintain it at that location using C-band frequencies for Telemetry, Tracking and Command (“TT&C”);<sup>1</sup> and (2) operate AMC-18 in the conventional C-band frequencies at 139° W.L. SES seeks STA pending action on its application for a Commission license authorizing relocation and operation of AMC-18.<sup>2</sup> Grant

---

<sup>1</sup> The AMC-18 TT&C frequencies and nominal polarizations are as follows:

Command: 6423.5 MHz (horizontal polarization; uplink)  
Telemetry: 3700.5 MHz (horizontal polarization; downlink), and  
4199.5 MHz (vertical polarization; downlink).

<sup>2</sup> See Application of SES Americom, Inc. for Authority to Relocate the AMC-18 C-Band Satellite to, and Operate the Satellite at, 139° W.L., submitted Dec. 21, 2018 (the “AMC-18 Application”). SES incorporates the supporting materials submitted with the AMC-18 Application by reference herein. SES notes that the AMC-18 Application was assigned file number SAT-LOA-20171221-00174 in IBFS, but SES assumes that IBFS will be updated with a file number that begins with the prefix for satellite operating authority, SAT-A/O.

of the requested authority will serve the public interest by allowing SES to use AMC-18 to provide back-up capacity for important services being provided by the AMC-8 spacecraft at 139° W.L.

At its current location of 104.95° W.L., AMC-18 operates pursuant to a license the Gibraltar Regulatory Authority (“GRA”) granted to a subsidiary of SES Americom, SES Satellites (Gibraltar) Ltd., and is authorized to serve the United States.<sup>3</sup> Because AMC-18 has been replaced at 104.95° W.L. by the C-band payload of the SES-11 satellite,<sup>4</sup> AMC-18 is available for reassignment. The AMC-18 Application seeks Commission authority to relocate AMC-18 to 139° W.L. and operate the satellite thereafter under a U.S. license. At that location, AMC-18 will be available to provide back-up capacity for the C-band AMC-8 spacecraft, which is jointly licensed to SES Americom and Alascom, Inc.<sup>5</sup> and provides important services to Alaska.

Pending action on the AMC-18 Application, SES requests STA to drift and operate the satellite in order to expedite the availability of AMC-18 to ensure service continuity as needed at 139° W.L. Because AMC-18 has already been replaced at 104.95° W.L., authorizing the satellite move will not affect service to existing customers.

Grant of the requested authority to relocate AMC-18 will serve the public interest and is consistent with Commission precedent. The Commission has repeatedly observed that its policy is to allow “satellite operators to rearrange satellites in their fleet to reflect business and

---

<sup>3</sup> SES Satellites (Gibraltar) Ltd., Call Sign S2713, File No. SAT-PPL-20061006-00118, granted Dec. 7, 2006.

<sup>4</sup> SES Satellites (Gibraltar) Limited, Call Sign S2964, File No. SAT-PPL-20160512-0048, granted Dec. 7, 2016.

<sup>5</sup> SES Americom, Inc. and Alascom, Inc., Call Sign S2379, File No. SAT-MOD-20151222-00086, granted Mar. 17, 2016 (extending the AMC-8 license term until June 30, 2020).

customer considerations where no public interest factors are adversely affected.”<sup>6</sup> As the International Bureau has explained:

the Commission attempts, when possible, to leave spacecraft design decisions to the space station licensee because the licensee is in a better position to determine how to tailor its system to meet the particular needs of its customers. Consequently the Commission will generally grant a licensee’s request to modify its system, provided there are no compelling countervailing public interest considerations.<sup>7</sup>

Here, the proposed change will allow SES to make efficient use of AMC-18 in order to protect service availability at the 139° W.L. orbital location. Relocation of AMC-18 to 139° W.L. will not adversely affect other operators. SES will operate only the TT&C frequencies of AMC-18 during the drift and will follow standard industry practices for coordination of TT&C transmissions during the relocation process. After AMC-18’s arrival satellite at 139° W.L., SES will closely control AMC-18 and AMC-8 to ensure their safe collocation.

---

<sup>6</sup> *SES Americom, Inc.*, Order and Authorization, DA 06-757 (IB rel. Apr. 7, 2006) at 4, ¶ 8, *citing Amendment of the Commission’s Space Station Licensing Rules and Policies*, Second Report and Order, 18 FCC Rcd 12507, 12509, ¶ 7 (2003).

<sup>7</sup> *AMSC Subsidiary Corp.*, Order and Authorization, DA 98-493, 13 FCC Rcd 12316, 12318, ¶ 8 (IB 1998) (footnote omitted).

For the foregoing reasons, SES respectfully requests grant of STA to permit relocation of AMC-18 to, and operation of the satellite at, 139° W.L.

Respectfully submitted,

SES AMERICOM, INC.

By: /s/ Nancy J. Eskenazi

Of Counsel

Karis A. Hastings  
SatCom Law LLC  
1317 F Street, N.W., Suite 400  
Washington, D.C. 20004  
Tel: (202) 599-0975

Nancy J. Eskenazi  
Vice President, Legal & Regulatory Affairs  
SES Americom, Inc.  
1129 20<sup>th</sup> Street, N.W., Suite 1000  
Washington, D.C. 20036

Dated: December 22, 2017