

S2713 SAT-STA-20171222-00175 IB2017003533
SES Americom, Inc.
AMC-18



File # SAT-STA-20171222-00175

Call Sign S2713 Grant Date 01/12/18

(or other identifier)

Term Dates period of
From 01/12/18 To: 60 days

Approved by OMB
3060-0678

Date & Time Filed: Dec 22 2017 4:35:36:966PM
File Number: SAT-STA-20171222-00175
Callsign:

Approved: *Stephen J. Duall*

Stephen J. Duall
Chief, Satellite Policy Branch

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
AMC-18 (S2713) Drift and Operating STA for Move to 139WL Dec 2017

1. Applicant

Name:	SES Americom, Inc.	Phone Number:	202-478-7144
DBA Name:		Fax Number:	202-478-7111
Street:	1129 20th Street NW Suite 1000	E-Mail:	Nancy.Eskenazi@ses.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20036 -
Attention:	Ms. Nancy Eskenazi		

ATTACHMENT TO GRANT
SES Americom, Inc.
IBFS File No. SAT-STA-20171222-00175

IBFS File No(s):	SAT-STA-20171222-00175	<p>GRANTED – With Conditions</p>  <p>International Bureau Satellite Division</p>
Licensee/Grantee:	SES Americom, Inc.	
Call Sign:	S2713 ¹	
Satellite Name:	AMC-18	
Orbital Location: (required station-keeping tolerance)	139.0° W.L. (+/- 0.05 degrees east/west station keeping)	
Administration:	United States of America	
Nature of Service:	Fixed Satellite Service (FSS) Telemetry, Tracking, and Command (TT&C)	
Scope of Grant:	Special temporary authority for a period of 60 days to: (1) conduct TT&C operations necessary to drift AMC-18 from its current location at the 104.95° W.L. orbital location to the 139.0° W.L. orbital location; and (2) provide FSS from the 139.0° W.L. orbital location in the 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (space-to-Earth) frequency bands.	
Service Area(s):	Western North America and parts of the Pacific Ocean. See the Technical Appendix in IBFS File No. SAT-A/O-20171221-00174.	
Frequencies:	C-band frequencies: 3700-4200 MHz (space-to-Earth) 5925-6425 MHz (Earth-to-space) TT&C center frequencies: 3700.5 MHz, 4199.5 MHz (space-to-Earth) 6423.5 MHz (Earth-to-space)	
<p>Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with Federal Communication Commission's rules not waived herein. This grant is also subject to the following conditions:</p> <ol style="list-style-type: none"> 1. Operations pursuant to this special temporary authority must be on an unprotected and non-harmful interference basis, i.e., the AMC-18 space station must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating station. In the event of any harmful interference, SES Americom must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event. 2. SES Americom must coordinate the operations of AMC-18 with existing geostationary space stations to ensure that no unacceptable interference results from its operations during drift to the 139.0° W.L. orbital location. 3. SES Americom must operate only the TT&C frequencies authorized for AMC-18 during the space station's drift from the 104.95° W.L. orbital location to the 139.0° W.L. orbital location. 4. While at the 139.0° W.L. orbital location, SES Americom must maintain the AMC-18 spacecraft with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees. 		

¹ In 2006, the Satellite Division granted U.S. market access to AMC-18, a Gibraltar-licensed space station, at the 104.95° W.L. orbital location under Call Sign S2713. See SAT-PPL-20061006-00118. On December 21, 2017, SES Americom, Inc. applied for a U.S. license to drift AMC-18 from the 104.95° W.L. orbital location to the 139.0° W.L. orbital location and operate AMC-18 at the 139.0° W.L. orbital location. That application is pending. See SAT-A/O-20171221-00174. SES Americom seeks this STA while its application for a U.S. license is pending. For purposes of administrative convenience and clarity, we have kept Call Sign S2713 for the satellite under U.S license.

ATTACHMENT TO GRANT
SES Americom, Inc.
IBFS File No. SAT-STA-20171222-00175

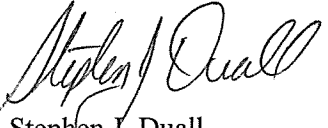
5. Grant of this authorization is without prejudice to any Commission action on IBFS File No. SAT-A/O-20171221-00174.
6. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at SES Americom's own risk.

Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned. This action is taken pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 CFR § 0.261, and is effective upon release.

Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).

Action Date:	January 12, 2018	
Term Dates	From: January 12, 2018	To: period of 60 days

Approved:


Stephen J. Duall
Chief, Satellite Policy Branch

2. Contact

Name:	Karis Hastings	Phone Number:	202-599-0975
Company:	SatCom Law LLC	Fax Number:	
Street:	1317 F St, NW Suite 400	E-Mail:	karis@satcomlaw.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20004 -
Attention:		Relationship:	Legal Counsel

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)

3. Reference File Number SATLOA2017122100174 or Submission ID

4a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity Noncommercial educational licensee
- Other (please explain):

4b. Fee Classification CRY – Space Station (Geostationary)

5. Type Request

- Change Station Location Extend Expiration Date Other

6. Temporary Orbit Location
139 W.L.

7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

SES Americom, Inc. requests special temporary authority for 60 days beginning on or before January 12, 2018 to permit relocation of the AMC-18 C-band satellite to 139 deg. W.L. and operation of the satellite under Commission authority at that location. See attached narrative.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes. Yes No

10. Name of Person Signing
Nancy J. Eskenazi

11. Title of Person Signing
VP, Legal & Regulatory Affairs

12. Please supply any need attachments.

Attachment 1: STA Narrative

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

**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”);¹ 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-18.² Grant

¹ 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).

² 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.³ Because AMC-18 has been replaced at 104.95° W.L. by the C-band payload of the SES-11 satellite,⁴ 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.⁵ 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

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

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

⁵ 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.”⁶ 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.⁷

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.

⁶ *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).

⁷ *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

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Dated: December 22, 2017