

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

In the Matter of)	
)	
SES AMERICOM, INC.)	File No. SAT-STA-_____
)	Call Sign S2432
Request for Special Temporary Authority for)	
the Decommissioning of the AMC-10)	
Fixed-Satellite Space Station)	

EXPEDITED ACTION REQUESTED

REQUEST OF SES AMERICOM, INC.

SES Americom, Inc. (“SES”) hereby respectfully requests special temporary authority (“STA”) for a period of 30 days in connection with its plans to decommission the AMC-10 space station and seeks a waiver of the orbital debris mitigation requirements of Section 25.283. Grant of the requested authority will serve the public interest by facilitating the removal of AMC-10 to a disposal orbit.

AMC-10 is a C-band satellite that is licensed to operate pursuant to Commission authority at 135° W.L., with a license term that expires on May 4, 2019.¹ SES’s C-band AMC-7 satellite is collocated with AMC-10 at 135° W.L.,² and its C/Ku-band hybrid AMC-4 spacecraft operates at 134.9° W.L.³ AMC-10 is not carrying any customer traffic, and SES had intended to begin orbit-raising maneuvers within the next few months, prior to the license’s expiration date.

¹ See *SES Americom, Inc.*, Call Sign S2434, File Nos. SAT-LOA-20020104-00001 & SAT-AMD-20021108-00213, granted Dec. 29, 2003.

² See *SES Americom, Inc.*, Call Sign S2155, File Nos. SAT-MOD-20150309-00010, granted May 21, 2015, & SAT-MOD-20180808-00060, granted Oct. 11, 2018.

³ See *SES Americom, Inc.*, Call Sign S2135, File No. SAT-MOD-20170518-00073, granted July 31, 2017.

However, SES has determined that moving up the satellite's retirement date is necessary to provide greater certainty that the orbit-raising maneuvers and satellite passivation can be successfully completed.

Because SES applied for and was granted the AMC-10 license before the Commission's orbital debris mitigation rules in Sections 25.114(d)(14) and 25.283(c) took effect in 2004 and has not sought any subsequent modifications of the satellite's authority, SES has not previously filed an orbital debris mitigation plan for the satellite. As demonstrated in the plan attached hereto, SES intends to raise AMC-10 to a disposal altitude with a minimum perigee of 280 kilometers above the geostationary arc, consistent with Section 25.283(a), to vent all excess propellant and pressurant, and to passivate the satellite as required by Section 25.283(c).

However, AMC-10 is a Lockheed Martin A2100 series spacecraft, and the oxidizer tanks on the spacecraft were sealed following completion of the launch phase and will therefore retain residual pressure when the spacecraft is retired. Given the spacecraft design, it is physically impossible for SES to vent the oxidizer tanks.

SES seeks a waiver of Section 25.283(c) with respect to this residual oxidizer.

Grant of the requested waiver is consistent with Commission policy and precedent:

The Commission may waive a rule for good cause shown. Waiver is appropriate if special circumstances warrant a deviation from the general rule and such deviation would better serve the public interest than would strict adherence to the general rule. Generally, the Commission may grant a waiver of its rules in a particular case if the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.⁴

⁴ *PanAmSat Licensee Corp.*, 17 FCC Rcd 10483, 10492 (Sat. Div. 2002) (footnotes omitted).

In a number of cases involving various spacecraft models with similar limitations, the Commission has waived Section 25.283(c) to permit launch and operation of spacecraft that do not allow for full venting of pressure vessels at end of life, based on a finding that modifying the space station design at a late stage of construction would pose an undue hardship.⁵ In the case of AMC-10, which was launched and operational before the venting requirements were adopted, there is no question of bringing the satellite into compliance with the rule. The Commission has expressly recognized this, finding a waiver of Section 25.283(c) to be justified for in-orbit spacecraft that cannot satisfy the rule's requirements. For example, in a decision involving the SES AMC-2 satellite, which like AMC-10 was launched before Section 25.283(c) was adopted, the Commission waived the rule on its own motion, observing that venting the spacecraft's sealed oxidizer tanks "would require direct retrieval of the satellite, which is not currently possible."⁶

The same practical obstacle is present here. Because AMC-10 is already in orbit, SES can do nothing to enable full venting of residual pressure in the oxidizer tanks. Given this

⁵ See, e.g., *EchoStar Satellite Operating Corp.*, File No. SAT-LOA-20071221-00183, Call Sign S2746, grant-stamped Mar. 12, 2008, Attachment at ¶ 4 (granting a partial waiver of Section 25.283(c) for AMC-14, a Lockheed Martin A2100 model spacecraft, on grounds that requiring modification of satellite would present an undue hardship); *DIRECTV Enterprises LLC*, File No. SAT-LOA-20090807-00086, Call Sign S2797, grant-stamped Dec. 15, 2009, Attachment at ¶ 4 (same for DIRECTV 12, a Boeing 702 model spacecraft); *PanAmSat Licensee Corp.*, File Nos. SAT-MOD-20070207-00027, SAT-AMD-20070716-00102, Call Sign S2237, grant-stamped Oct. 4, 2007, Attachment at ¶ 7 (same for Intelsat 11, an Orbital Sciences Star model spacecraft).

⁶ File No. SAT-MOD-20101215-00261, Call Sign S2134, grant-stamped Mar. 8, 2011, Attachment at ¶ 4. See also *XM Radio Inc.*, File No. SAT-MOD-20100722-00165, Call Sign S2616, grant-stamped Oct. 14, 2010, Attachment at ¶ 2 (waiving Section 25.283(c) for XM-4, a Boeing 702 model spacecraft, because "modification of the spacecraft would present an undue hardship, since XM-4 is an in-orbit space station and venting XM-4's helium and xenon tanks would require direct retrieval of the satellite, which is not currently possible").

reality, waiver is clearly warranted; there is no possible public interest benefit in requiring strict adherence to a rule with which the licensee is incapable of complying.

For the foregoing reasons, SES respectfully requests that the Commission grant an STA and Section 25.283(c) waiver to permit retirement of AMC-10 pursuant to the attached orbital debris mitigation plan.

Respectfully submitted,

SES Americom, Inc.

By: /s/ Petra A. Vorwig

Of Counsel

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

Petra A. Vorwig
Senior Legal and Regulatory Counsel
SES Americom, Inc.
1129 20th Street N.W., Suite 1000
Washington, D.C. 20036

Dated: February 12, 2019

Annex: AMC-10 Orbital Debris Mitigation Plan

Spacecraft Hardware Design: SES has assessed and limited the amount of debris released in a planned manner during normal operations of AMC-10 at 135.0° W.L. No debris is generated during normal on-station operations, and the spacecraft is in a stable configuration. The satellite is operating with an E-W stationkeeping tolerance of +/- 0.05 degrees.

SES has also assessed and limited the probability of the space station becoming a source of orbital debris by collisions with small debris or meteoroids that could cause loss of control and prevent post-mission disposal. SES requires that spacecraft manufacturers assess the probability of micrometeorite damage that can cause any loss of functionality. This probability is then factored into the ultimate spacecraft probability of success. Any significant probability of damage would need to be mitigated in order for the spacecraft design to meet SES' required probability of success of the mission. SES has taken the following steps to limit the effects of such collisions: (1) critical spacecraft components are located inside the protective body of the spacecraft and properly shielded; and (2) all spacecraft subsystems have redundant components to ensure no single-point failures. The spacecraft will not use any subsystems for end-of-life disposal that are not used for normal operations.

Minimizing Accidental Explosions: SES has assessed and limited the probability of accidental explosions during and after completion of mission operations. As part of the Safety Data Package submission for SES spacecraft, an extensive analysis is completed by the spacecraft manufacturer, reviewing each potential hazard relating to accidental explosions. A matrix is generated indicating the worst-case effect, the hazard cause, and the hazard controls available to minimize the severity and the probability of occurrence. Each subsystem is analyzed for potential hazards, and the Safety Design Package is provided for each phase of the program running from design phase, qualification, manufacturing and operational phase of the spacecraft. Also, the spacecraft manufacturer generates a Failure Mode Effects and Criticality Analysis for the spacecraft to identify all potential mission failures. The risk of accidental explosion is included as part of this analysis. This analysis indicates failure modes, possible causes, methods of detection, and compensating features of the spacecraft design.

The design of the AMC-10 spacecraft is such that the risk of explosion is minimized both during and after mission operations. In designing and building the spacecraft, the manufacturer took steps to ensure that debris generation will not result from the conversion of energy sources on board the satellite into energy that fragments the satellite. All propulsion subsystem pressure vessels, which have high margins of safety at launch, have even higher margins in orbit, since use of propellants and pressurants during launch decreases the propulsion system pressure. Burst tests were performed on all pressure vessels during qualification testing to demonstrate a margin of safety against burst. Bipropellant mixing is prevented by the use of valves that prevent backwards flow in propellant and pressurization lines. All pressures, including those of the batteries, are monitored by telemetry.

At the end of operational life, after the satellite has reached its final disposal orbit, onboard sources of stored energy will be depleted or secured, and the batteries will be discharged.

However, at the end of AMC-10's operational life, there will be oxidizer remaining in the tanks that cannot be vented. Following insertion of the spacecraft into orbit, the spacecraft manufacturer permanently sealed the oxidizer tanks by firing pyrotechnic valves. This is a design feature of the Lockheed A2100 series spacecraft that cannot now be changed or remedied. Information regarding the residual oxidizer in the tanks is as follows:

Tank	Volume (l)	Pressure (bar)	Temp. (deg C)	Oxidizer mass (kg)
Ox 1	229.1	17.5	17.0	8.02
Ox 2	229.1	17.5	17.0	8.02

Safe Flight Profiles: SES has assessed and limited the probability of the space station becoming a source of debris by collisions with large debris or other operational space stations. Specifically, SES has assessed the possibility of collision with satellites located at, or reasonably expected to be located at, the requested orbital location or assigned in the vicinity of that location. Regarding avoidance of collisions with controlled objects, in general, if a geosynchronous satellite is controlled within its specified longitude and latitude stationkeeping limits, collision with another controlled object (excluding where the satellite is collocated with another object) is the direct result of that object entering the allocated space.

AMC-10 currently operates at the 135.0° W.L. orbital location and on-station operations require station-keeping within the +/- 0.05 degree N-S and +/- 0.05 degree E-W control box, thereby ensuring adequate collision avoidance distance from other satellites in geosynchronous orbit. The satellite is collocated with AMC-7 at 135.0° W.L., and AMC-4 operates at 134.9° W.L. As these spacecraft are also controlled by SES, the company coordinates operations of the satellites. SES is not aware of any other FCC- or non-FCC licensed spacecraft that are operational or planned to be deployed at 135.0° W.L. or to nearby orbital locations such that there would be an overlap with the stationkeeping volume of AMC-10. Furthermore, SES is not aware of any other system with an overlapping station-keeping volume with AMC-10 that is either in orbit or progressing towards launch. Based on the preceding, it is concluded that physical coordination of the AMC-10 satellite with another party is not required at the present time.

SES uses the Space Data Center ("SDC") system from the Space Data Association to monitor the risk of close approach of its satellites with other objects. Any close encounters (separation of less than 10 km) are flagged and investigated in more detail. If required, avoidance maneuvers are performed to eliminate the possibility of collisions. During any relocation, the moving spacecraft is maneuvered such that it is at least 30 km away from the synchronous radius at all times. In most cases, much larger deviation from the synchronous radius is used. In addition, the SDC system is used to ensure no close encounter occurs during the move. When de-orbit of a spacecraft is required, the initial phase is treated as a satellite move, and the same precautions are used to ensure collision avoidance.

Post-Mission Disposal: Post-mission disposal of the satellite from operational orbit will be accomplished by carrying out maneuvers to a higher orbit. The upper stage engine remains part

of the satellite, and there is no re-entry phase for either component. The fuel budget for elevating the satellite to a disposal orbit is included in the satellite design. SES plans to maneuver AMC-10 to a disposal orbit with a minimum perigee of 280 km above the normal GSO operational orbit. This proposed disposal orbit altitude results from application of the IADC formula based on the following calculation:

Total Solar Pressure Area “A” = 29.7 m²

“M” = Dry Mass of Satellite = 933.8 kg

“CR” = Solar Pressure Radiation Coefficient = 1.4

Therefore the Minimum Disposal Orbit Perigee Altitude:

= 36,021 km + 1000 x CR x A / M

= 36,021 km + 1000 x 1.40 x 29.7 / 933.8

= 36,066 km

= 280 km above GSO (35,786 km)

SES intends to reserve 5.1 kg of propellant in order to account for post-mission disposal of AMC-10. SES has assessed fuel-gauging uncertainty and has provided an adequate margin of fuel reserve to address the assessed uncertainty.

DECLARATION

I, Charles Law, hereby certify under penalty of perjury that I am the technically qualified person responsible for preparation of the technical information contained in the foregoing application; that I am familiar with the technical requirements of Part 25; and that I either prepared or reviewed the technical information contained in the application and that it is complete and accurate to the best of my knowledge, information and belief.

/s/ Charles Law

Senior Manager, Flight Dynamics
SES S.A.

Dated: February 12, 2019