

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

In the Matter of)	
)	
SES AMERICOM, INC.)	File No. SAT-STA-_____
)	Call Sign S2379
ALASCOM, INC.)	
)	
Request for Special Temporary Authority to)	
Relocate the AMC-8/Aurora III Fixed-Satellite)	
Space Station to, and Operate it at, 135° W.L.)	

JOINT REQUEST OF SES AMERICOM, INC. and ALASCOM, INC

SES Americom, Inc. (“SES”) and Alascom, Inc. (“Alascom”) (collectively, the “Licensees”) respectfully request special temporary authority (“STA”) for a period of 60 days beginning no later than April 21, 2020, to permit relocation of the AMC-8/Aurora III (“AMC-8”) C-band fixed-satellite space station from 139° W.L. to 135° W.L. Specifically, the Licensees seek authority to: (1) drift AMC-8 from its current position at 139° W.L. to 135° W.L. and maintain it at that location using C-band frequencies for Telemetry, Tracking and Command (“TT&C”);¹ and (2) operate AMC-8 in the conventional C-band frequencies at 135° W.L. The Licensees seek STA pending submission of and action on an application to modify the AMC-8

¹ The AMC-8 TT&C frequencies and nominal polarizations are as follows:

<u>Command:</u>	6423.5 MHz (Horizontal polarization; uplink)
<u>Telemetry:</u>	3700.5 MHz (Horizontal polarization; downlink; Vertical polarization during emergency operations), and 4199.5 MHz (Vertical polarization; downlink).

license to reassign the satellite.² Grant of the requested authority will serve the public interest by allowing SES to use AMC-8 to supplement the C-band capacity at 135° W.L.

AMC-8 currently operates in inclined orbit at 139° W.L.,³ where it is collocated with SES's AMC-18 C-band spacecraft. In response to customer demand, the Licensees propose to relocate AMC-8 to 135° W.L., where it will continue to operate in inclined orbit. SES operates the AMC-4 C/Ku-band satellite at 134.9° W.L., with an east-west stationkeeping tolerance of +/- 0.05 degrees.⁴ After its relocation, AMC-8 will be available to supplement the C-band capacity at the nominal 135° W.L. orbital location.

In order to meet customer requirements, the Licensees request STA to drift and operate AMC-8 pending submission of the underlying modification application and Commission action on that filing. Because AMC-18 will remain in service at 139° W.L., authorizing the AMC-8 move will not affect service to existing customers.

Grant of the requested authority to relocate AMC-8 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

² The modification application will also seek a further extension of the AMC-8 license term, which currently expires on June 30, 2020. *See* SES Americom, Inc. and Alascom, Inc., Call Sign S2379, File No. SAT-MOD-20151222-00086, granted Mar. 17, 2016.

³ *See* Letter of Karis A. Hastings, Counsel for SES Americom, Inc., to Marlene H. Dortch, Call Sign S2379, filed Nov. 13, 2019 (notifying the Commission that AMC-8 had commenced inclined orbit operations).

⁴ SES Americom, Inc., Call Sign S2135, File No. SAT-MOD-20170518-0073, granted July 31, 2017.

customer considerations where no public interest factors are adversely affected.”⁵ 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.⁶

Here, the proposed change will allow the Licensees to make efficient use of AMC-8 to respond to demand for C-band service at 135° W.L. Relocation of AMC-8 to 135° W.L. will not adversely affect other operators. Only the TT&C frequencies of AMC-8 will be used during the drift, and the Licensees will follow standard industry practices for coordination of TT&C transmissions while the satellite is being relocated.⁷ After AMC-8’s arrival at 135° W.L., SES will closely control AMC-4 and AMC-8 to ensure their safe joint operation.

⁵ *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).

⁶ *AMSC Subsidiary Corp.*, Order and Authorization, DA 98-493, 13 FCC Rcd 12316, 12318, ¶ 8 (IB 1998) (footnote omitted).

⁷ The 24/7 point of contact for the proposed drift is the SES Payload Management Operations Centre (PMOC) in Woodbine, MD, 1 800 772 2363 or 1 410 970 7570; e-mail: PMOC@ses.com.

For the foregoing reasons, the Licensees respectfully request grant of STA to permit relocation of AMC-8 to, and operation of the satellite at, 135° W.L.

Respectfully submitted,

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