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By Electronic Filing

Mr. Paul Blais
Chief, Systems Analysis Branch
Satellite Division, International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: SES Americom, Inc.

File Nos. SES-LIC-20140618-00529, Call Sign E140059
SES-LIC-20140912-00723, Call Sign E140095
SES-MOD-20140930-00779, Call Sign E090060

Dear Mr. Blais:

Pursuant to Section 1.65 of the Commission's rules, SES Americom, Inc. ("SES") hereby submits the following update with respect to each of the above-referenced earth station applications.

SES specified TT&C carriers in the Schedule B of each application that span an entire FSS band (*e.g.*, 14.0-14.5 GHz or 5925-6425 MHz). SES recognizes, however, that Section 25.202(g) of the Commission's rules require TT&C functions to be performed at the edges of these bands. As a result, SES would accept a condition on each of the requested licenses that would restrict the use of these TT&C carriers to the band edge, except in the case of operations with satellites for which the Commission has previously granted a waiver of Section 25.202(g).¹ Such a condition would be consistent with the purpose of the Commission's efforts to streamline

¹ See, *e.g.*, SES Americom, Inc., File No. SES-MOD-20140616-00521, Call Sign E120055 (granted Aug. 27, 2014), which imposed the following condition:

6565 Telemetry, tracking and telecommand (TT&C) operations identified in part B, Particulars of Operation in this authorization shall be conducted at either or both edges, in accordance with 47 C.F.R. 25.202 (g). Frequencies, polarization and coding shall be selected to minimize interference into other satellite networks. Transmission and reception of TT&C signals not at a band edge is granted only if a waiver of 47 C.F.R. § 25.202(g) has been granted for the specific satellite and the satellite operator agrees.

its space and earth station licensing rules. Once a satellite with mid-band TT&C is added to the Permitted Space Station List with a waiver of Section 25.202(g), earth station licensees should not need to request additional authority or waivers from the Commission in order to perform TT&C with such a satellite.²

SES also requested authorization for unmodulated carriers (with emission designator “NON”) in each application for testing purposes. SES is aware of the limitations imposed by Section 25.211 (b) whereby: “The transmission of an unmodulated carrier at a power level sufficient to saturate a transponder is prohibited, except by the space station licensee to determine transponder performance characteristics.” SES requests a limited waiver of 25.211 (b) to allow for pseudo beacon operations required to assist in activation of remote stations and will accept condition 3813, which was previously imposed on its E120055 license for such carriers: “Use of the ‘NON’ Emission designator signal authorized herein must be prior coordinated with all adjacent satellites. (NON is a CW signal). The Commission reserves the right to terminate use of the NON signal without a Hearing if, in its judgement, such action is warranted.”

Please address any questions concerning this submission to the undersigned.

Respectfully submitted,

/s/ Daniel C.H. Mah

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² SES notes that the Commission has waived Section 25.202(g) for a number of older Intelsat-designed satellites and their replacements (including some that were spun-off to SES-affiliate, New Skies Satellites B.V.). These satellites have TT&C in the middle of the conventional C-band. SES is not aware of the Commission having waived Section 25.202(g) for any satellite with TT&C in the middle of the Ku-band or any other band. However, SES cannot rule out the possibility that an applicant could, in the future, request U.S. authority for, say, a satellite that only operates in the 14.0-14.25 GHz and has a command carrier at 14.25 GHz. If the Commission were to authorize such a satellite, appropriately licensed earth stations in that band should not need to seek additional authority or waivers.