

Narrative Statement

By this application, United Teleports respectfully requests earth station authority to permit to use of its 7-meter earth station on E160081 to communicate with the ASTRA 1D spacecraft in order to provide Tracking, Telemetry and Command (“TT&C”) while the spacecraft is positioned at 73° W.L. (+/- 0.10° east/west station keeping). This request follows the previously granted STA for this Call Sign SES-STA-20180613-01096 and the operations granted on ASTRA 1D in that request.

SES ASTRA S.A. (“SES ASTRA”), holds an authorization from the Luxembourg Ministry of State, Office of Media and Communications for the ASTRA 1D Ku-band spacecraft. SES Americom has requested that United Teleports assist with providing TT&C to support the operation of ASTRA 1D at 73.0° W.L. The ASTRA 1D satellite is operating in inclined orbit. SES Americom currently uses Call Sign E110104 for receipt of telemetry and as a back-up for transmission of commands as needed for ASTRA 1D. United Teleports request for E160081 will provide back-up to the SES Americom services on an as needed basis.

United Teleports is not requesting U.S. market access or any other authorization from the Commission in relation to the non-U.S.-licensed ASTRA 1D spacecraft, and therefore is not providing full technical information about the ASTRA 1D satellite as part of this application.

United Teleports requests a Waiver of FCC 25.137. Waiving Section 25.137 is consistent with the purpose of the rule, which was intended to address situations in which a non-U.S.-licensed satellite is to be used to serve the United States. Here, the E160081 earth station will be used solely for TT&C, not for commercial operations. Thus, United Teleports

is not seeking authority to communicate with ASTRA 1D for purposes of providing U.S. service within the meaning of Section 25.137.

Operations on ASTRA 1D will be limited to provide telemetry, tracking, and command (“TT&C”) services on-station station keeping operations while ASTRA 1D is positioned at 73° W.L. orbital location using frequencies: 14013.00 MHz and 14493.00 MHz (Earth-to-space); and 11447.50 MHz and 11454.00 MHz (space-to-Earth) under the following conditions:

- 1: All operations must be within the coordinated emission and power limits.
2. This station will only be used as a secondary, back-up TT&C Earth Station, only for the reception of telemetry from the spacecraft and as back up for transmission of commands if needed.
3. All operations under this grant of authority will be on an unprotected and non-harmful interference basis. United Teleports will not cause harmful interference to and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.
4. In the event of any harmful interference as a result of operations under this grant United Teleports will cease operations immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.
5. United Teleports understands that any action or expense incurred as a result of operations pursuant to this authority is solely at United Teleports risk.
- 6.. United Teleports' request for a waiver of Section 25.210(j) Section 25.210 (j) requires geostationary space stations to be maintained within ± 0.05 degrees of their assigned orbital locations unless specifically authorized by the Commission to operate with a different longitudinal tolerance. The operations of ASTRA 1 D satellite with an east-west

station keeping tolerance of ± 0.10 degrees of its assigned orbital location in the east/west direction is authorized as long as no other space station is located within the station-keeping volume. Should a spacecraft be launched or relocated into the station-keeping volume of ASTRA 1D, then Astra 1D is required to maintain $\pm 0.05^\circ$ East/West station-keeping or coordinate its operations with that of the other spacecraft.

Grant of this request is in the public interest as the requested TT&C authority will facilitate the safe operation of ASTRA 1D at 73.0° W.L.