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By Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: SES Americom, Inc. Applications to Modify Earth Station Licenses
File Nos.: SES-MOD-20170601-00616 (Call Sign E160015);
SES-MOD-20170601-00617 (Call Sign E160022); and
SES-MOD-20170601-00618 (Call Sign E160021)**

Dear Ms. Dortch:

SES Americom, Inc. ("SES"), by its attorney and pursuant to Section 1.65 of the Commission's rules, 47 C.F.R. § 1.65, hereby updates the record with respect to the above-referenced earth station modification applications to request a six-month extension, until January 13, 2018, of the required construction completion date for three gateway earth stations (call signs E160015, E160021, and E160022) licensed to communicate with the SES-15 space station (call sign S2951).¹ As discussed herein, grant of the requested extension is consistent with Commission precedent and will serve the public interest.

The three gateway earth stations will support operations of SES-15, a high-throughput satellite that will include 46 Ku-band spot beams that will significantly increase the capacity and data rates available to satellite broadband and aeronautical consumers in the United States. SES-15 was successfully launched on May 18, 2017, and is expected to have reached its assigned orbital location of 129.15° W.L. and be ready to begin commercial operations in January, 2018. In the above-referenced modification applications, SES is seeking Commission authority for larger antennas at each gateway site in order to improve throughput and facilitate coordination between SES and other users. See, e.g., File No. SES-MOD-20170601-00616, Narrative at 1.

Pending action on the modification applications, SES has been building the gateways at its own risk using the requested larger antenna sizes. However, due to a variety of circumstances, SES

¹ SES also takes this opportunity to provide additional transmit gain information for the proposed antennas in the 29.5-30 GHz band. Specifically, the transmit gain for each of the 9.2 meter antennas proposed in Brewster, WA (Call Sign E160015) and South Mountain, CA (Call Sign E160021) at 30 GHz is 66.1 dBi. The transmit gain for the 13.2 meter antenna proposed in Woodbine, MD (Call Sign E160022) at 30 GHz is 69.1 dBi.

will be unable to complete the construction of the gateways by the July 13, 2017 date specified in the underlying licenses for the smaller antennas originally authorized.

Section 25.117(e) of the Commission's rules, 47 C.F.R. § 25.117(e), specifies that a request to extend a required completion date must be supported by information showing that additional time is needed due to circumstances beyond the applicant's control or that unique and overriding public interest concerns justify an extension. Here, the antennas for deployment at the gateway sites are custom-built, requiring additional time at both the design and construction phases. Moreover, these U.S. gateway facilities are part of an international network of ground stations being deployed contemporaneously to enable SES-15 operations. The build-out of this network requires a coordinated effort on the part of SES's personnel and involves overlapping demands on SES's limited ground segment support resources.

Furthermore, as discussed above, the SES-15 satellite will not be in position and ready to commence commercial operations until well after the current construction completion deadline of July 13. Requiring SES to complete construction and commence operation of the gateways months prior to the SES-15 operational date would result in unnecessary and wasteful expenditure of resources with no countervailing public interest benefit.

Granting the requested extension will permit SES a limited additional period to finish the installation of facilities at the gateway sites while the related modification applications are pending and will not delay initiation of services from the SES-15 space station. The larger gateway antennas will be in place by the time SES-15 arrives at its assigned orbital location, and will be able to support the advanced telecommunications offerings the satellite will provide to U.S. businesses and consumers, enhancing competition and contributing to economic growth.

Under these circumstances, the public interest warrants grant of the requested extension of time to complete construction of the SES-15 gateway earth stations. An affidavit in support of this request is attached.

Please address any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Karis A. Hastings

Karis A. Hastings
Counsel for SES Americom, Inc.
karis@satcomlaw.com

Attachment

cc: Paul Blais
Trang Nguyen

DECLARATION

I, Petra A. Vorwig, hereby certify under penalty of perjury that I have reviewed the foregoing document and that it is complete and accurate to the best of my knowledge, information and belief. In particular, I certify that the requested six-month extension of time to complete construction of the SES-15 gateway earth stations is justified by unique and overriding public interest concerns and stems from circumstances beyond SES's control.

/s/ Petra A. Vorwig
Petra A. Vorwig
Senior Legal & Regulatory Counsel
SES Americom, Inc.

Dated: June 15, 2017