

January 19, 2007

Mr. Robert G. Nelson  
Chief, Satellite Division  
Federal Communications Commission  
445 12<sup>th</sup> St, N.W.  
Washington, D.C. 20554

File Nos. SES-STA-20061020-01876 through -01880,  
SES-STA-20061211-02123 through -02128  
SES-STA-20070109-00043 through -00047

Dear Mr. Nelson:

This is in response to your letter to James Barker dated January 18, 2007, referencing the applications listed above. SES Americom addresses the questions you raise, and can answer any additional questions you may have concerning this matter.

1. *When did AMC-18 leave the 80° W.L. location, and when did it arrive at the 81° W.L. location? Was the communications payload of the spacecraft, i.e., other than TT&C functions, operated after the spacecraft left 80° W.L.? If yes, please explain the nature and scope of such operations.*

AMC-18 left the 80° W.L. location on January 9, 2007, and arrived at the 81° W.L. location on January 11, 2007. The communications payload of the spacecraft was not operated during the drift but was operated after the satellite arrived at 81° W.L. Specifically, from January 12 to January 16 multiple carriers were transmitted from a non-U.S. facility to transponders on both polarizations of the satellite.

2. *Did SES Americom transmit signals to or receive signals from AMC-18, using a U.S. earth station, during the drift of AMC-18 from 80° W.L. to 81° W.L.? Was a U.S. earth station utilized to effect the placement of the satellite at the 81° W.L. orbital position? Did SES Americom transmit signals to or receive signals from AMC-18 at 81° W.L. using a U.S. earth station?*

SES Americom has not used a U.S. earth station to control the satellite during the drift from 80° W.L. to 81° W.L., to place the satellite at 81° W.L., or to transmit and receive service from the satellite over the satellite payload. As a precautionary redundancy measure, in addition to primary receipt of the satellite telemetry beacons at the non-U.S. earth station, two U.S. earth stations have passively monitored the telemetry beacons of the satellite during the drift and while the satellite has been at 81° W.L.

3. *When did SES Americom, SES Global, and/or SES Gibraltar first begin planning for a possible stop of AMC-18 at 81° W.L.? When were those plans finalized? When did SES Gibraltar first discuss those plans with Gibraltar regulators? When did SES Americom become aware of those discussions?*

SES Americom has over time considered possible operation of satellites at 81° W.L., including possible transactions involving AMC-18, subject to appropriate regulatory approval. However, none of these matters has matured.

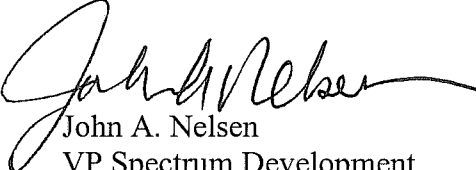
In late November-early December 2006 SES Americom began seriously considering the possibility of using AMC-18 for a demonstration service at 81° W.L. in order to evaluate the ability to use a multi-feed dish for IPTV service from satellites at two degree spacing. This evaluation is relevant to SES Americom's work with local exchange carriers to develop IPTV services, especially for rural customers. The 81° W.L. orbital location is not currently in use, and is adjacent to operations that SES Americom has underway for IPTV at 79° W.L. However, SES Americom recognized that the opportunity for such a service evaluation was limited given that AMC-18 was to be launched on December 8, and needed to be in place to meet important customer requirements at 104.95° W.L. by the end of January 2007.

I am a Vice President and officer of SES Americom and an officer of SES Satellites (Gibraltar) Ltd. I first discussed this matter with Gibraltar regulators on December 8, 2006, when I was with them at the launch of AMC-18 in Kourou. Plans for the service evaluation were finalized after the successful launch of the satellite and these discussions. An application to the Commission was filed on December 11. Pursuant to the rules of the Gibraltar Regulatory Authority ("GRA"), SES Satellites (Gibraltar) Ltd. made a formal notification of its plans on December 12, (see Attachment A), and the GRA provided a non-objection confirmation by letter of December 19 (see Attachment B).

As recognized in your letter, on January 18 SES Americom withdrew its applications for special temporary authority to operate the AMC-18 satellite at 81° W.L. The company will not be able to conduct the IPTV service evaluation as planned given the customer requirements for use of AMC-18 at 104.95° WL by the end of the month. The satellite must begin moving to that orbital location immediately to meet that deadline.

Pursuant to Section 1.16 of the Commission's rules, I declare under penalty of perjury that the following is true and correct, and that I am executing this statement on the above-referenced date.

Respectfully submitted,



John A. Nelsen  
VP Spectrum Development

cc: Scott Kotler  
Andrea Kelly  
Cassandra Thomas  
Gardner Foster  
Karl Kensinger  
Frank Peace  
Sergio Scarabino, Comision National de Comunicaciones de Republica  
Argentina

(All by e-mail)

**John A. Nelsen**  
Vice President Business Operations

**CONFIDENTIAL & PROPRIETARY**

Mr. Paul Canessa  
Chief Executive  
Gibraltar Regulatory Authority  
Suite 811 Europort  
Gibraltar

December 12, 2006

RE: AMC-18 Notification #2

Dear Paul,

In accordance with the Outer Space Act Licence for AMC18, SES Satellites (Gibraltar) Limited ("SES-G") hereby notifies the Gibraltar Regulatory Authority that on completion of In Orbit Testing ("IOT") of AMC-18 at the 80°W orbital position on January 1, 2007, the satellite will be repositioned to 81°W for a period not to exceed twenty days in order to facilitate technical demonstrations for customers. Operation will be on a non-interference basis relative to adjacent operating satellite systems: SES AMERICOM (AMC2 at 85°W AMC9 at 83°W, and C3 at 79°W) and Intelsat (Galaxy 4R at 77°W). There is no other satellite operating at 81°W. When operation at 81°W is completed, the satellite will be repositioned to 105°W (Actual operation will be 104.95°W ± .05°W to facilitate co-location with SES AMERICOM's AMC15 Ka/Ku satellite which will operate 105.05°W ± .05°W.) SES-G will notify the GRA of commencement of the drift to and arrival at 105°W.

If you have any questions please contact Norbert Schroeder at (+44) 7796 178 536, or myself at the address/telephone numbers below.

Regards,

A handwritten signature in black ink, appearing to read "John", with a long horizontal flourish extending to the right.



Gibraltar Regulatory Authority

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**Your ref:**  
**Our ref:** 182A  
**Date:** 19 December 2006

Mr John A Nelsen  
Vice President Business Operations  
SES Satellites (Gibraltar) Limited  
Four Research Way  
Princeton  
NJ 08540  
USA

Dear John

**AMC-18 Notification #2**

We note the contents of AMC-18 Notification #2 and raise no regulatory objections.

Please notify us once the operation at 81°W is complete and the drift is commenced to reposition the satellite to 105°W.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Paul J Canessa', is written over a horizontal blue line.

Paul J Canessa  
Chief Executive