

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

SES Americom, Inc. (“SES Americom”) respectfully requests c (“STA”), starting on or about January 7, 2011, to use Antenna #2 (a 13.1 meter VERTEX antenna) listed on earth station license WB81 to perform telemetry, tracking and command (“TT&C”) functions with the Netherlands-authorized NSS-703 spacecraft during the relocation of the satellite to the 47.05° W.L. orbital location. All TT&C operations during the relocation will be performed in the following C-band frequencies on a non-interference basis:

Telecommand:	6173.7 MHz, 6176.3 MHz
Telemetry:	3947.5 MHz, 3948.0 MHz, 3952.5 MHz, 3952.0 MHz
Tracking Beacon:	3950.0 MHz

SES Satellites (Gibraltar) Ltd (“SES Gibraltar”), an indirect wholly-owned subsidiary of SES Americom, has filed a petition for declaratory ruling to add the NSS-703 satellite to the FCC’s Permitted Space Station List to provide C- and Ku-band service to the United States from the 47.05° W.L. orbital location. *See* File No. SAT-PPL-20101103-00230. SES Gibraltar has been authorized by the Gibraltar Regulatory Authority to utilize the C- and Ku-band frequencies at the nominal 47° W.L. orbital location to serve various countries within the satellite’s footprint. A full description of the licensing and technical specifications of the satellite (including its TT&C subsystem) is contained in SES Gibraltar’s filing with the Commission.

The NSS-703 satellite has already commenced its drift towards 47.05° W.L. from its previous orbital location at the nominal 57° E.L. orbital location. TT&C for the drift is currently being performed using earth stations located in Betzdorf, Luxembourg, and Nemea, Greece. As the satellite begins crossing the Atlantic Ocean, a U.S. antenna will be used in place of one of the European antennas. To this end, SES Americom has arranged with its affiliated companies to use Antenna #2 on earth station license WB81 to begin taking over TT&C for the drift starting on or about January 7, 2011, when the satellite will be at about 10° W.L. The satellite is expected to arrive on-station at 47.05° W.L. on or about March 1, 2011.

SES Americom acknowledges that the TT&C frequencies for the NSS-703 satellite are located at the center of the allocated C-band frequencies, and not at the band edges as required by 47 C.F.R. § 25.202(g). SES Americom respectfully requests a waiver of § 25.202(g) to the extent one is required for the grant of this STA. As explained in SES Gibraltar’s petition for declaratory ruling, NSS-703’s use of center-of-band TT&C frequencies is simply the product of the historical, international origins of the NSS-703 satellite as a former INTELSAT satellite. The FCC has previously waived § 25.202(g) for former INTELSAT satellites that are now serving the United States as U.S.- or foreign-licensed spacecraft,¹ and should do so again here on the same basis.

¹ *See* Petition of Declaratory Ruling at 6-8 notes 16, 18 & 23, *in* File No. SAT-PPL-20101103-00230 (filed Nov. 3, 2010) (pending).

Grant of the requested STA and any necessary waiver will serve the public interest as it will assure safe operation of the satellite during its relocation. An earth station on the east coast of the United States (such as WB81) will have good look-angles towards the satellite while it is over the Atlantic Ocean. The grant of the STA will also not cause any harmful interference. The use of the C-band frequencies on Antenna #2 on earth station license WB81 has been coordinated with terrestrial services as far east as 5° W.L. *See* File Nos. SES-MOD-20100615-00702, SES-AMD-20100820-01064 (pending); Public Notice, Report No. SES-01301 (rel. Dec. 8, 2010).

For all of these reasons, SES Americom respectfully requests expeditious grant of a 30-day STA to use Antenna #2 on earth station WB81 to perform TT&C with the NSS-703 satellite during its drift to 47.05° W.L. by no later than January 7, 2011.