

## **REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

SES Americom, Inc. (“SES Americom”) respectfully requests a Special Temporary Authority (“STA”), starting on or about March 4, 2011, to use the earth station license with call sign E070181 to perform telemetry, tracking and command (“TT&C”) functions with the NSS-703 spacecraft once it arrives at the 47.05° W.L. orbital location. All on-station TT&C operations will be performed in the following C-band frequencies:

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

As the Commission is aware, 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 Nos. SAT-PPL-20101103-00230, SAT-APL-20110120-00015 (Call Sign S2818; *Public Notice*, Report No. SAT-00753, rel. Feb. 1, 2011). 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.

SES Gibraltar has arranged with its affiliate SES Americom to use earth station E070181 to perform TT&C functions for the NSS-703 satellite once the satellite arrives on-station at 47.05° W.L. Once SES Gibraltar’s Permitted List petition is granted, all U.S. earth stations with an “ALSAT” or “Permitted List” designation will be authorized to communicate with NSS-703 at 47.05° W.L. Pending the grant of that petition, however, SES Americom is requesting an STA to allow earth station E070181 to communicate with the spacecraft.

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,<sup>1</sup> and should do so again here on the same basis. *See also* SES-STA-20101208-01518 (granted Dec. 10, 2010) (granting STA to use earth

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

station WB81 to perform TT&C on center-of-band frequencies with NSS-703 during drift to 47.05° W.L.).

Grant of the requested STA and any necessary waiver will serve the public interest as it will assure safe operation of the NSS-703 satellite once it arrives on-station at 47.05° W.L. Grant of the STA will also not cause any harmful interference. The use of the C-band frequencies on earth station E070181 has been coordinated with terrestrial services for orbital locations as far east as 15° W.L. *See* File No. SES-MOD-20100930-01226 (granted Nov. 8, 2010).

For all of these reasons, SES Americom respectfully requests expeditious grant of a 30-day STA to use earth station E070181 to perform on-station TT&C with the NSS-703 satellite at 47.05° W.L. by no later than March 4, 2011.