

APPLICATION FOR SPECIAL TEMPORARY AUTHORITY

SES Americom, Inc. (“SES”) hereby applies for a 60-day Special Temporary Authority (“STA”) to operate a new 11.3 meter VIASAT 8013A antenna (E110104) at Bristow, Virginia, pending the grant of an earth station license for that antenna.¹

Proposed Operations. SES is seeking authority to operate the E110104 antenna on the following frequencies with the Netherlands-licensed NSS-7 satellite:

10.95-11.20 GHz (space-to-Earth)
11.45-11.70 GHz (space-to-Earth)
11.70-12.20 GHz (space-to-Earth)
11451, 11454 MHz (telemetry)

14.00-14.50 GHz (Earth-to-space)
14496, 14499 MHz (telecommand)

The technical details for the proposed operations are contained in the pending application for an earth station license for this antenna, and are hereby incorporated by reference.² Use of the extended Ku-band downlink frequencies has been coordinated with co-primary terrestrial users.³

Grant of the Requested STA is in the Public Interest. SES respectfully requests expedited grant of the requested STA by November 10, 2011. As the Commission is aware, the primary role of the E110104 antenna will be to serve as the primary TT&C and communications antenna for NSS-7 following the planned launch of its replacement, the Netherlands-licensed SES-4 satellite, in December 2011.⁴ Expedited grant of the requested STA will serve the public interest by enabling SES to fully test the antenna with NSS-7 prior to the launch of SES-4.

Grant of the requested STA is Consistent with Commission Precedent. The Commission has previously authorized earth station E020071 at the same teleport location to communicate with the NSS-7 satellite, including use of the extended Ku-band downlink frequencies to receive communications and telemetry signals.⁵

Request for Limited Waiver of International Service Restriction. SES acknowledges that use of the extended Ku-band frequencies in the United States is limited to international service only.⁶ For the limited purpose of testing the antenna prior to grant of regular authority, SES is requesting a waiver of the international service restriction for

¹ See File No. SES-LIC-20110715-00830 (on public notice August 10, 2011). No comments were received during the public comment period for this application.

² See *id.*

³ See *id.* (Coordination Report).

⁴ *Id.*, Narrative at 1. See also SAT-PPL-20110620-00112 (on public notice July 8, 2011).

⁵ See File No. SES-LIC-20020328-00433.

⁶ 47 C.F.R. §§ 2.106 NG104, 25.202(a) Note 2.

the duration of this STA. To the extent necessary, a waiver is also being requested for use of the antenna to receive telemetry signals from NSS-7 in the extended Ku-band.

Grant of the requested waiver is warranted in the circumstances. First, as the Commission has recognized, TT&C operations generally require uplink and downlink capability from the same earth station. For this reason, the Commission has previously granted waivers of the international service restriction to enable TT&C to be performed in the U.S. using the extended Ku-band.⁷ Second, grant of a waiver would not undermine the purpose of the rule, which is to ensure that earth stations in the extended Ku-band do not unduly restrict the deployment of fixed service (“FS”) in the same band or cause harmful interference to FS operations. Here, there will be no such impact. The telemetry and communications downlinks from SES-4 will comply with the power flux density limits in the Commission’s rules and, therefore, will not interfere with FS station operations. In addition, the STA will be for a new antenna located at the same teleport as another antenna that is already authorized to receive communications from NSS-7 in the extended Ku-band. As a result, the grant of the requested waiver will impose no significant restrictions on the deployment of FS in the same band.⁸

⁷ See *EchoStar KuX Corporation*, 20 FCC Rcd 919 (Int’l Bur. 2004) (“*EchoStar 83W Order*”); *EchoStar Satellite LLC*, 20 FCC Rcd 930 (Int’l Bur. 2004) (“*EchoStar 109W Order*”); *EchoStar KuX Corporation*, 20 FCC Rcd 942 (2004).

⁸ See *EchoStar 83W Order*, at ¶ 16 (“The Commission has waived this requirement [i.e. NG104] where the number of potential earth stations in a particular service is inherently small.”); *EchoStar 109W Order*, at ¶ 16 (same); *EchoStar 121W Order*, at ¶ 17 (same).