



Approved: _____

From: _____ To: _____

(or other identifier) Term Dates _____

Call Sign _____ Grant Date _____

File # _____

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Request for 60-day STA to Use Call Sign E170138 for SES-15 Early Orbit Raising

1. Applicant

Name:	SES Americom, Inc.	Phone Number:	202-478-7143
DBA Name:		Fax Number:	202-478-7111
Street:	1129 20th Street NW Suite 1000	E-Mail:	petra.vorwig@ses.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20036 -
Attention:	Ms Petra A Vorwig		



File # SES-STA-20170914-01018
Call Sign E170138 Grant Date 09/18/2017
(or other identifier)
Term Dates
From: 09/19/2017 To: 11/18/2017
Approved: Kerry Thomas

"with conditions"



Volume: _____

From: _____ To: _____

Year Date

(or other identifier)
Call Sign _____ Class Date

File # _____

Applicant: SES Americom, Inc.
File No.: SES-STA-20170914-01018
Call Sign: E170138
Special Temporary Authority

SES Americom, Inc., is granted a special temporary authority for 60 days, beginning September 19, 2017, to operate a 9 meter antenna Ku-band earth station located at its Woodbine, Maryland teleport to provide telemetry, tracking, and command (TT&C) services to support early orbit raising ("EOR") of the SES-15 satellite (Call Sign S2951) at 129.15° W.L., using the following center frequency bands 10700.5 MHz and 12199.5 MHz (space-to-Earth) and 13999 MHz, 14001 MHz, and 14499 MHz (Earth-to-space), under the following conditions:

1. All operations under this grant of special temporary authority shall be on an unprotected and non-harmful interference basis. SES Americom, Inc., shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.
2. In the event of any harmful interference as a result of operations under this grant SES Americom, Inc. shall cease operations immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.
3. Operations in the 13.75-14.0 GHz band may only exceed 85 dBW/carrier if an emergency situation exists and the applicant must notify FCCOperationCenter@fcc.gov of the situation with a copy to paul.blais@fcc.gov.
4. Grant of this special temporary authority is without prejudice to any determination that the Commission may make regarding pending application SES-LIC-20170726-00805.
5. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at SES Americom, Inc.'s risk.
6. This grant is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release.



"With conditions"

File # SES-STA-20170914-01018

Call Sign E170138 Grant Date 09/18/2017
(or other identifier)

Term Dates
From: 09/19/2017 To: 11/18/2017

Approved: Ken Murray

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
SES AMERICOM, INC.)	File No. SES-STA-_____
)	Call Sign E170138
Request for Special Temporary Authority to)	
Support Early Orbit Raising for SES-15)	

REQUEST OF SES AMERICOM, INC.

SES Americom, Inc. (“SES”) respectfully requests special temporary authority (“STA”) for 60 days, commencing September 19, 2017, to utilize a Ku-band antenna located at its Woodbine, Maryland teleport¹ to provide Tracking, Telemetry and Command (“TT&C”) to support early orbit raising (“EOR”) of the SES-15 satellite. SES-15 was launched on May 18, 2017 and has been transiting toward its in-orbit test location of 137° W.L. The EOR period is expected to last up to 60 days.

SES Satellites (Gibraltar) Ltd., an affiliate of SES Americom, has been granted market access authority to provide service using SES-15 at the 129.15° W.L. orbital location.² Prior to commencing operations at 129.15° W.L., SES-15 will undergo in-orbit testing at 137° W.L. The authority requested in this application is necessary to complete orbit raising for the satellite from its transfer orbit to its test location.

¹ A license application for this antenna is pending before the Commission. *See* SES Americom, Inc., Call Sign E170138, File No. SES-LIC-20170726-00805, filed July 26, 2017. The application was placed on public notice as acceptable for filing on August 9, 2017, *see* Report No. SES-01980, and no comments were filed, so the application is ripe for action.

² SES Satellites (Gibraltar) Limited, (Call Sign S2951), File No. SAT-MPL-20160718-00063, granted Dec. 14, 2016.

The SES-15 TT&C operations for EOR will be performed at the following frequencies: 10700.5 MHz and 12199.5 MHz (space-to-Earth) and 13999 MHz, 14001 MHz, and 14499 MHz (Earth-to-space) using a linear polarization.³ SES will coordinate the TT&C transmissions with all operators of satellites that use the same frequency bands and are in the EOR path and will provide them with an emergency number where the licensee can be reached in the event that harmful interference occurs.

The 24x7 contact information for the SES-15 EOR mission is as follows: Payload Management Operations Center Level 1, +1 410 970 7570; +1 800 772 2363; pmocl1@ses.com.

In connection with this STA request, SES seeks any necessary waiver of the international-service-only restriction in footnote NG52 of Section 2.106 of the Commission's rules⁴ to permit reception of a telemetry beacon in the 10.7-11.7 GHz band on an unprotected, non-interference basis. Such a waiver is warranted in the circumstances for the limited purpose of TT&C. 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 frequencies.⁵

³ An analysis of the proposed operations in the 13.75-14.0 GHz band conducted by Comsearch was submitted in the pending license application, File Number SES-LIC-20170726-00805, and is incorporated by reference herein.

⁴ 47 U.S.C. § 2.106 Footnote NG52.

⁵ See, e.g., 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) ("*EchoStar109W Order*"); EchoStar KuX Corporation, 20 FCC Rcd 942 (2004) ("*EchoStar 121W Order*"). These decisions granted waivers of the international only restriction in Footnote NG104, which has been replaced by Footnote NG52.

Grant of the requested waiver would not undermine the purpose of the restriction, which is to ensure that earth station deployments in the extended Ku-band do not negatively impact the deployment of fixed service ("FS") in the same band or cause interference to such operations. The telemetry downlink signals from SES-15 in the extended Ku-band are narrow in bandwidth, and will comply with the power flux density limits in the Commission's rules and, thus, will not interfere with FS station operations. Moreover, only a small number of U.S. earth stations will be used to perform TT&C in the extended Ku-band.⁶ The TT&C to support EOR will be performed by the antenna in Woodbine, Maryland and one additional U.S. earth station. As a result, there will be no significant restrictions placed on the deployment of FS in this band.

For the foregoing reasons, SES respectfully requests special temporary authority to communicate with SES-15 for a period of up to 60 days in order to provide TT&C in support of EOR for the satellite as described herein.

Respectfully submitted,

SES AMERICOM, INC.

By: /s/ Petra A. Vorwig

Of Counsel

Karis A. Hastings
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Petra A. Vorwig
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Dated: September 14, 2017

⁶ See *EchoStar 83W Order*, at ¶ 16 ("The Commission has waived this [international only] requirement 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).

2. Contact

Name:	Karis Hastings	Phone Number:	202-599-0975
Company:	SatCom Law LLC	Fax Number:	
Street:	1317 F St, NW	E-Mail:	karis@satcomlaw.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20004 -
Attention:		Relationship:	Legal Counsel

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)

3. Reference File Number or Submission ID

4a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity Noncommercial educational licensee
- Other (please explain):

4b. Fee Classification CGX – Fixed Satellite Transmit/Receive Earth Station

5. Type Request

- Use Prior to Grant Change Station Location Other

6. Requested Use Prior Date

09/19/2017

7. CityMt. Airy

8. Latitude

(dd mm ss.s h) 39 22 36.8 N

9. State MD	10. Longitude (dd mm ss.s h) 77 4 47.46 W
11. Please supply any need attachments. Attachment 1: STA Narrative Attachment 2: Attachment 3:	
12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.) <div style="border: 1px solid black; padding: 5px; margin: 5px 0;">SES Americom, Inc. requests authority for 60 days to operate its new Ku-band antenna, described in file number SES-LIC-20170726-00805, beginning on September 19, 2017, to support early orbit raising (EOR) of the SES-15 satellite (call sign S2951). EOR will be performed using the following frequencies</div>	
13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes. <input checked="" type="radio"/> Yes <input type="radio"/> No	
14. Name of Person Signing Petra A. Vorwig	15. Title of Person Signing Senior Legal & Regulatory Counsel
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).	

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