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By Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: SES Americom, Inc. Applications for Authority for E170089 Earth Station to Support Relocation of ASTRA 3A Satellite to 86.8° W.L.,
File Nos. SES-MFS-20191002-01233 & SES-STA-20191002-01255**

Dear Ms. Dortch:

SES Americom, Inc. ("SES"), by its attorney and pursuant to Section 1.65 of the Commission's rules, 47 C.F.R. § 1.65, hereby updates the record with respect to the above-referenced earth station modification application to permit the E170089 earth station to support relocation of the ASTRA 3A satellite to 86.8° W.L. ("Modification") and the related request for special temporary authority ("STA Request"). Specifically, SES advises the Commission of a minor change in the orbital debris mitigation information for ASTRA 3A that was submitted with these applications.

SES indicated in its filings that it expected the NSS-6 satellite operated at 86.8° W.L. by its affiliate New Skies Satellites B.V. to be relocated from that location prior to the arrival of ASTRA 3A.¹ However, because the move of NSS-6 may be delayed, SES now anticipates that there could be a period after ASTRA 3A's arrival when it will be collocated at 86.8° W.L. with NSS-6.

This change will not materially affect the matters addressed in the orbital debris mitigation statement for ASTRA 3A. During any collocation of ASTRA 3A and NSS-6, SES will use the proven Inclination-Eccentricity technique to ensure adequate separation between the two satellites. This strategy is presently in use by SES at several orbital locations to ensure proper operation and safety of multiple satellites within one orbital box. The Commission has previously authorized satellite collocations that rely on this approach.² Moreover, because SES entities

¹ See Modification, Narrative at 2 n.4 & Attachment 2 at 1 n.1. The STA Request incorporated by reference the detailed information supplied in the Modification.

² See, e.g., *SES Americom, Inc.*, Call Sign S2713, File No. SAT-A/O-20171221-00174, Technical Appendix at 4-5 (discussing planned use of the Inclination-Eccentricity technique to

operate both satellites, this change does not require SES to coordinate operations of ASTRA 3A with a third party.

SES asks the Commission to incorporate this updated information into the record in these proceedings and act expeditiously on the STA Request to permit relocation of ASTRA 3A to commence on or about October 23, 2019. Please address any questions regarding this matter to the undersigned.

Respectfully submitted,

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facilitate collocation of the AMC-18 and AMC-8 satellites at 139° W.L.), granted-stamped Mar. 8, 2018.