

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

In the Matter of Application by)
)
SES AMERICOM, INC.) Call Sign E190099
)
For Special Temporary Authority to)
Communicate with NSS-6 to Perform)
TT&C During Relocation to 169.5° W.L.)

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

By this application, SES Americom, Inc. (“SES Americom” or “SES”) respectfully requests earth station special temporary authority (“STA”) for a period of 30 days starting no later than January 15, 2020 to permit SES to use its E190099 earth station to communicate with the NSS-6 spacecraft using extended and conventional Ku-band frequencies to provide Tracking, Telemetry and Command (“TT&C”) during the planned relocation of the spacecraft from its current position at 86.8° W.L. to its authorized location at 169.5° W.L.¹ SES Americom is also seeking STA to use E190099 to provide TT&C for NSS-6 while it is operating at 169.5° W.L. in the event the underlying earth station license application has not been approved.²

¹ New Skies Satellites B.V., Call Sign S3048, File No. SAT-PDR-20190403-00022, granted Sept. 12, 2019. As shown in Attachment 1, the TT&C frequencies for NSS-6 are:

11198.0 MHz and 11199.5 MHz telemetry and
14496.0 MHz and 14499.0 MHz command.

² SES Americom, Inc., Call Sign E190099, File No. SES-LIC-20190228-00193, filed Feb. 28, 2019.

SES Americom's affiliate, New Skies Satellites B.V. ("NSS BV"), holds an authorization from Radiocommunications Agency Netherlands³ for the NSS-6 Ku-band spacecraft. NSS BV has requested that SES Americom assist with providing TT&C to support the planned relocation of NSS-6 to 169.5° W.L.

TT&C transmissions during drift of NSS-6 will be on a non-harmful interference basis. The drift of the spacecraft will be coordinated with other satellite operators consistent with industry practice.⁴

Waiver Requests. SES requests a limited waiver of the Commission's requirements in connection with the instant request. Grant of this waiver is consistent with Commission policy:

The Commission may waive a rule for good cause shown. Waiver is appropriate if special circumstances warrant a deviation from the general rule and such deviation would better serve the public interest than would strict adherence to the general rule. Generally, the Commission may grant a waiver of its rules in a particular case if the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.⁵

To the extent that reception of telemetry at 11198 MHz and 11199.5 MHz constitutes a domestic (*i.e.*, non-international) service, SES Americom respectfully requests a limited waiver of the international-service-only restriction.⁶ Such a waiver is warranted in the circumstances for the limited purpose of performing TT&C. As the Commission has recognized,

³ Agentschap Telecom.

⁴ The 24/7 point of contact for the proposed NSS-6 operations is the SES Payload Management Operations Centre (PMOC) in Woodbine, MD, 1 410 970 7580; e-mail: PMOC@ses.com.

⁵ *PanAmSat Licensee Corp.*, 17 FCC Rcd 10483, 10492 (Sat. Div. 2002) (footnotes omitted).

⁶ 47 U.S.C. § 2.106 Footnote NG52.

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.⁷

Grant of the requested waiver would not undermine the purpose of the restriction, which is to ensure that earth station authorizations 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 NSS-6 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 two U.S. earth stations will be used to perform TT&C in the extended Ku-band at any time⁸ as E190099 will take over operations once the satellite moves out of view of E050287, for which SES has requested separate authority.⁹ As a result, there will be no significant restrictions placed on the deployment of FS in this band.

SES hereby certifies that no party to this application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

⁷ 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) (“*EchoStar 109W 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.

⁸ 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).

⁹ SES Americom, Inc., Call Sign E050287, File No. SES-STA-INTR2019-04069, filed Nov. 26, 2019. See also SES Americom, Inc., Call Sign KA288, File No. SES-STA-INTR2019-04070, filed Nov. 26, 2019

For the foregoing reasons, SES respectfully requests special temporary authority to communicate with NSS-6 for a period of up to 30 days to provide TT&C during relocation of the satellite and once it is on station, as described herein. Grant of the requested authority will promote safe operation of the satellite during and after its relocation.

Respectfully submitted,

SES AMERICOM, INC.

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Attachment 1: TT&C Emission Characteristics

1. Earth Station Transmission Characteristics

E190099

Emission Designator: 1M00F9D

Max EIRP: 73.00 dBW

Max EIRP Density: 49.10dBW/4kHz

2. TT&C Frequencies ¹

| | | |
|-------------|-------------|--|
| Telecommand | 14496.0 MHz | Vertical polarization via global horn; horizontal polarization via omni in case of emergency |
| | 14499.0 MHz | Vertical polarization via global horn; horizontal polarization via omni in case of emergency |
| Telemetry | 11198.0 MHz | Horizontal polarization via global horn; vertical polarization via omni in case of emergency |
| | 11199.5 MHz | Horizontal polarization via global horn; vertical polarization via omni in case of emergency |

¹ In compliance with Section 25.202(g)(1) of the Commission's rules, the proposed TT&C operations will cause no greater interference and require no greater protection from harmful interference than communications traffic in these bands.