

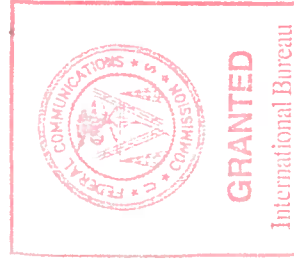
Approved by OMB
3060-0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
30-Day STA for E190099 to provide TT&C for NSS-6 Move to and Operations at 169.5 W.L.

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-20191126-01593
Call Sign E190099 Grant Date 3/11/2020
(or other identifier)
Term Dates
From 3/11/2020 To: 4/10/2020
Approved: [Signature]

2. Contact	
Name: Karis Hastings	Phone Number: 202-599-0975
Company: SatCom Law LLC	Fax Number:
Street: 1317 F Street, N.W. Suite 400	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? <input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other (please explain):	
4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station	
5. Type Request <input type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> Other	
6. Requested Use Prior Date 01/15/2020	
7. City Haleiwa	
8. Latitude (dd mm ss.s h) 21 40 14.88 N	

9. State	HI	10. Longitude (dd mm ss.s h)	158 1 55.72 W
11. Please supply any need attachments.		Attachment 1: STA Narrative	Attachment 2: Attachment 3:
<p>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.)</p> <div style="border: 1px solid black; padding: 5px;"> <p>SES Americom, Inc. requests special temporary authority for a period of 30 days beginning January 15, 2020 to permit earth station E190099 to communicate with the Dutch-licensed NSS-6 spacecraft in order to provide telemetry, tracking and control during drift to and operation of the satellite at 169.5 W.L., the satellite's authorized orbital location. See</p> </div>			
<p>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.</p> <p style="text-align: right;">Yes <input checked="" type="radio"/> No <input type="radio"/></p>			
14. Name of Person Signing	Petra A. Vorwig	15. Title of Person Signing	Senior Legal & Regulatory Counsel
<p>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).</p>			

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12. Description

SES Americom, Inc. requests special temporary authority for a period of 30 days beginning January 15, 2020 to permit earth station E190099 to communicate with the Dutch-licensed NSS-6 spacecraft in order to provide telemetry, tracking and control during drift to and operation of the satellite at 169.5 W.L., the satellite's authorized orbital location. See attachment.

Applicant: SES Americom, Inc.
Call Sign: E190099
File No.: SES-STA-20191126-01593
Special Temporary Authority ("STA")



File # SES-STA-20191126-01593
Call Sign E190099 Grant Date 3/11/2020
(or other identifier)
Term Dates
From 3/11/2020 To: 4/10/2020
Approved: *[Signature]*

SES Americom, Inc. ("SES Americom") is granted STA for 30 days beginning March 11, 2020 to utilize its fixed earth station at geographic coordinates 21° 40' 14"N, 158° 01' 55"W in Haleiwa, HI to provide telemetry, tracking, and command ("TT&C") services for the Dutch-licensed NSS-6 satellite to drift from 86.8° W.L to its authorized orbital location of 169.5° W.L. operating on frequencies: 14496.0 MHz and 14499.0 MHz (V,H polarization) (Earth-to-space), 11198.0 MHz and 11199.5 MHz (H,V polarization) (space-to-Earth) under the following conditions:

1. Emission designator 1M00F9D, maximum eirp of 73.0 dBW, maximum eirp density of 49.1 dBW/4kHz.
2. All operations shall be on an unprotected and non-harmful interference basis, and shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference and must inform the Commission, in writing, immediately of such an event.
3. All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached when harmful interference occurs.
4. Currently the 24x7 contact information for the NSS-6 mission is SES Payload management Operations Centre (PMOC), Woodbine, MD, phone +1 410 970 7580, e-mail PMOC@ses.com
5. Grant of this STA is without prejudice to any determination that the Commission may make regarding pending or future SES Americom, Inc. applications.
6. This authorization is not for a U.S. Market Access operation.
7. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at SES Americom, Inc's risk.

This action 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.

**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.

By: /s/ Petra A. Vorwig

Of Counsel

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Dated: November 26, 2019

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.