

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

Request of)
)
SES AMERICOM, INC.) Call Sign E190489
)
For Special Temporary Authority to)
Communicate with NSS-6 to Perform)
TT&C During and After 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 April 1, 2020, to permit SES to use its E190489 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 The license for this earth station has not yet been granted,² but the Commission has authorized the earth station to commence certain operations pending action on the license application.³

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 E190489, File Nos. SES-LIC-20190611-00756 & SES-AFS-20200103-00002. The thirty-day public notice period for these applications has elapsed, and no comments were filed.

³ SES Americom, Inc., Call Sign E190489, File No. SES-STA-20200203-00102, granted Feb. 26, 2020.

SES Americom's affiliate, New Skies Satellites B.V. ("NSS BV"), holds an authorization from Radiocommunications Agency Netherlands⁴ 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.⁵

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.⁶

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.⁷ Such a waiver is warranted in the circumstances for the limited purpose of performing TT&C. As the Commission has recognized, TT&C operations generally require uplink and downlink capability from the same earth station.

⁴ Agentschap Telecom.

⁵ 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.

⁶ *PanAmSat Licensee Corp.*, 17 FCC Rcd 10483, 10492 (Sat. Div. 2002) (footnotes omitted).

⁷ 47 U.S.C. § 2.106 Footnote NG52.

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.⁸

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 three U.S. earth stations will be used to perform TT&C in the extended Ku-band at any time.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.

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

⁸ See, e.g., *EchoStar KuX Corp.*, 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 Corp.*, 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.

⁹ 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).

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

Emission Designator: 1M00F9D
Max. EIRP: 76.0 dBW
Max. EIRP Density: 52.1 dBW/4kHz

2. TT&C Frequencies

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

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.