

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

In the Matter of	)	
	)	
SES AMERICOM, INC.	)	File No. SAT-MOD-_____
	)	Call Sign S3098
Fleet Management Notice to Modify	)	
SES-20 Fixed-Satellite Space Station License	)	

FLEET MANAGEMENT NOTICE OF SES AMERICOM, INC.

SES Americom, Inc. (“SES”) respectfully submits this notification pursuant to the Commission’s fleet management procedures to modify the SES-20 fixed-satellite space station license to reflect that the satellite will be deployed to 103.05° W.L. instead of to 135° W.L. A completed FCC Form 312 is attached. In addition, SES is providing below a certification in support of this notification as required by Section 25.118(e) of the Commission’s rules, 47 C.F.R. § 25.118(e).

BACKGROUND

Last August SES applied for licenses to launch, test, and operate SES-20 and three other C-band replacement satellites to provide service continuity and facilitate clearing part of the C-band spectrum as ordered by the Commission.¹ At the time it filed the applications, SES proposed to deploy SES-20 to 135° W.L. to replace AMC-8 and the C-band capacity of AMC-4.²

¹ *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343 (2020).

² *SES Americom, Inc.*, Call Sign S3098, File No. SAT-RPL-20210812-00101 (“SES-20 Application”), Narrative at 1, granted March 14, 2022 (“SES-20 License”).

SES noted, however, that the intended orbital locations for SES-20 and the other C-band satellites might change depending on when each of the spacecraft was completed and launched.³

SES has revised its deployment plan and now proposes to position SES-20 at 103.05° W.L. +/- 0.1 degrees rather than at 135° W.L.⁴ At the 103.05° W.L. location, SES-20 will operate within the technical parameters currently licensed and coordinated for SES-21.⁵ SES is concurrently filing a fleet management application notifying the Commission of its intention to position SES-21 at 131° W.L. rather than 103.05° W.L. Altering the SES-20 orbital location will allow SES to better respond to C-band customer requirements and to manage its fleet more efficiently.

CERTIFICATION OF COMPLIANCE WITH SECTION 25.118(e)

SES hereby certifies that this fleet management notice complies with the requirements of Section 25.118(e), as indicated below:

- (1) SES-20 will be deployed to 103.05° W.L. +/- 0.1 degrees, an orbital location assigned to SES Americom, Inc.
- (2) At 103.05° W.L., SES-20 will be operated within the technical parameters authorized and coordinated for the SES-21 spacecraft.

³ SES-20 Application, Narrative at 8 n.21.

⁴ The SES-22 satellite, launched in June, is fulfilling the mission at 135° W.L. originally envisioned for SES-20.

⁵ *SES Americom, Inc.*, Call Sign S3099, File No. SAT-RPL-20210812-00102 (“SES-21 Application”), granted March 14, 2022 (“SES-21 License”).

The SES-21 Application requested a waiver of Section 25.210(j) of the Commission’s rules to allow positioning of the satellite at 103.05° W.L. with an east-west stationkeeping tolerance of +/- 0.1 degrees. SES-21 Application, Narrative at 9-10. The SES-21 License included a grant of that waiver, but in certain places in the grant document, the stationkeeping tolerance was erroneously referred to as +/- 0.01 degrees rather than +/- 0.1 degrees. *See, e.g.*, SES-21 License, Attachment to Grant at 1, ¶ 3. SES requests that the Commission correct these references when it re-issues the SES-20 License to reflect the updated orbital location and to specify an authorized east-west stationkeeping tolerance of +/- 0.1 degrees.

- (3) SES certifies that it will comply with all the conditions of its SES-20 License for operation at the changed location.
- (4) SES certifies that it will limit operations of SES-20 to TT&C functions during the satellite drift transition period.
- (5) SES Americom certifies that
 - (i) It has assessed and limited the probability of SES-20 becoming a source of debris as a result of collisions with large debris or other operational satellites at 103.05° W.L.⁶ and
 - (ii) The proposed station-keeping volume of SES-20 at 103.05° W.L. will not overlap a station-keeping volume reasonably expected to be occupied by any non-SES satellite, including those authorized by the Commission, applied for and pending before the Commission, or otherwise the subject of an ITU filing and either in orbit or progressing towards launch. SES will internally manage the collocation of its satellites at this location.
- (6) SES certifies that the reassignment of SES-20 will not result in a lapse of service for any current customer.
- (7) Not applicable.
- (8) Not applicable.

* * *

Pursuant to the Commission's fleet management policies and as described herein, SES notifies the Commission that it intends to deploy SES-20 to 103.05° W.L. no earlier than 30 days following submission of this notification.

⁶ See SES-20 Application, Technical Appendix at 2-6 (describing the orbital debris mitigation plan for SES-20).

Respectfully submitted,

SES AMERICOM, INC.

By: /s/ Kelsie Rutherford

Of Counsel

Karis A. Hastings

SatCom Law LLC

6930 Carroll Avenue, Suite 720

Takoma Park, MD 20912-4499

Tel: (202) 599-0975

Kelsie Rutherford

Regulatory Counsel

SES Americom, Inc.

1129 20th Street, N.W., Suite 1000

Washington, DC 20036

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