

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

In the Matter of	)	
	)	
NEW SKIES SATELLITES B.V.	)	File No. SAT-PPL-_____
	)	
Request for U.S. Market Access for SES-10	)	

PETITION

New Skies Satellites B.V. (“New Skies,” doing business as “SES”) hereby respectfully requests that the Commission authorize the Colombian-licensed SES-10 spacecraft to serve the U.S. market from 67° W.L. At that location, SES-10 will replace the Ku-band capacity currently being provided using the U.S.-licensed AMC-3 and AMC-4 satellites and will provide expanded service using additional frequency bands. Specifically, SES requests that the Commission: (i) add SES-10 to the Commission’s Permitted Space Station List (“Permitted List”) for fixed-satellite service (“FSS”) and telemetry, tracking and control (“TT&C”) operations in the conventional Ku-band; (ii) authorize use of SES-10 conventional Ku-band capacity for direct-to-home (“DTH”) service within the United States and between the U.S. and the other markets identified herein; (iii) permit use of SES-10 extended Ku-band capacity in the 10.95-11.2 GHz, 11.45-11.7 GHz, and 13.75-14.0 GHz bands for FSS, consistent with the Commission’s rules and subject to earth station-specific licensing; and (iv) permit use of the SES-10 capacity in the 17.3-17.55 GHz Appendix 30A band for FSS subject to earth station-specific licensing.¹ Grant of the requested authority is consistent with Commission precedent

¹ SES-10 will also have capacity in the 27.85-28.35 GHz band, but SES does not seek U.S. market access in those frequencies, as the beam operating in that spectrum does not have U.S. coverage. A general description of this SES-10 payload is included in the technical materials submitted with this application for informational purposes only.

and will serve the public interest by allowing SES to continue to provide service from 67° W.L. and to respond to customer demand for DTH capacity.

A completed FCC Form 312 is attached, along with technical materials on Schedule S² and in narrative form pursuant to Section 25.114 of the Commission's rules. Launch of SES-10 is currently scheduled to occur in the third quarter of 2016, and SES seeks action on this petition consistent with that schedule.

I. BACKGROUND

SES Americom, an affiliate of New Skies, currently operates the AMC-3 and AMC-4 spacecraft at 67° W.L. under U.S. license in accordance with International Telecommunication Union ("ITU") filings of the Colombian Administration, as Notifying Administration for the Andean Community ("CAN").³ The AMC-3 and AMC-4 satellites provide a wide range of FSS services, including transmission of video and narrowband to wideband digital services, to customers in the southern U.S., Central America, and parts of the Caribbean and South America.

SES-10 will provide follow-on service at 67° W.L. As in the case of AMC-3 and AMC-4, SES-10 will operate on a non-common carrier basis. In addition to the frequencies

² In completing the Schedule S, SES has relied on the most recent Schedule S instructions. Consistent with those instructions, in cases where the Schedule S software requests information that space station applicants are no longer required to provide, SES has omitted data elements, or where necessary to permit validation of the Schedule S file, has entered a "1" as a placeholder. SES specifies that these "1" data entries are outside the scope of the certifications herein regarding accuracy of the information provided with this petition.

³ See *SES Americom, Inc.*, Call Sign S2162, File No. SAT-MOD-20111220-00243, grant-stamped June 28, 2012 (authorizing operation of AMC-3 at 67° W.L. in the conventional Ku-band); *SES Americom, Inc.*, Call Sign S2135, SAT-MOD-20100623-00144, grant-stamped Nov. 4, 2010 (authorizing operation of AMC-4 at 67° W.L. in the conventional and extended Ku-band).

available on AMC-3 and AMC-4, SES-10 is capable of operating in the extended Ku-band, the Appendix 30A band, and certain Ka-band spectrum. The following table compares the frequency bands on the existing AMC-3 and AMC-4 satellites with those on SES-10.

Frequency Band	AMC-3 and AMC-4	SES-10
Conventional C-band	AMC-3 and AMC-4 have conventional C-band payloads, but are authorized only for limited TT&C operations in that spectrum at 67° W.L.	No C-band payload
Conventional Ku-band	11.7-12.2 GHz downlink; 14.0-14.5 GHz uplink	11.7-12.2 GHz downlink; 14.0-14.5 GHz uplink
Extended Ku-band	11.45-11.7 GHz downlink on AMC-4; 13.75-14.0 GHz uplink on AMC-4	10.95-11.2 GHz downlink; 11.45-11.7 GHz downlink; 13.75-14.0 GHz uplink
Appendix 30A band	Not on AMC-3 or AMC-4	17.3-17.55 GHz uplink
Ka-band	Not on AMC-3 or AMC-4	27.85-28.35 GHz uplink for use outside the U.S.

The majority of the frequencies on the SES-10 satellite will operate under ITU filings submitted by the Colombia Administration on behalf of CAN. The exceptions are as follows: operations in the 10.95-11.2 GHz and 27.85-28.35 GHz bands will be under ITU filings submitted by Luxembourg, and operations in the 17.3-17.55 GHz band will be under filings submitted by the Government of Gibraltar through the United Kingdom.

II. AUTHORIZING SES-10 TO SERVE THE U.S. IS CONSISTENT WITH COMMISSION POLICIES AND THE PUBLIC INTEREST

SES is a leading provider of satellite communications services in the United States and around the world. The application to serve the U.S. using the proposed SES-10 satellite reflects SES's continuing commitment to meeting the existing and future needs of customers. Granting U.S. market access for SES-10 will enable SES to provide service continuity at the 67° W.L. orbital location and to introduce new capacity for the benefit of U.S.

satellite service customers. Furthermore, grant of market access for SES-10 is consistent with the Commission's *DISCO II* policies.⁴

In the *DISCO II* proceeding, the Commission adopted policies for determining whether to permit foreign-licensed satellites to serve the U.S. market, and these standards are codified in Section 25.137 of the Commission's Rules.⁵ The Commission's policies are intended to ensure that entry by a foreign-licensed satellite will not distort competition in the U.S.⁶ The Commission also considers whether there are spectrum availability issues or concerns relating to national security, law enforcement, foreign policy or trade that would present an obstacle to U.S. market access.⁷ The SES request to add SES-10 to the Permitted List in the conventional Ku-band, authorize use of the satellite's other payloads consistent with the Commission's rules, and permit use of the spacecraft's conventional Ku-band capacity for DTH services fully complies with the Commission's market access requirements.

A. FSS Operations

In *DISCO II*, the Commission adopted a presumption that with respect to services covered by the WTO agreement, entry into the U.S. market by entities licensed by WTO member countries will promote competition in the U.S. market.⁸ FSS operations except for DTH are

⁴ See *Amendment of the Commission's Policies to Allow Non-U.S. Licensed Space Stations providing Domestic and International Service in the United States*, Report & Order, 12 FCC Rcd 24094 (1997) ("*DISCO II*").

⁵ 47 C.F.R. § 25.137.

⁶ *DISCO II* at ¶ 7.

⁷ See *id.* at ¶ 178.

⁸ *Id.* at ¶ 39.

covered by the WTO agreement.⁹ SES seeks authority to use SES-10 to provide FSS services to U.S. customers. Because Colombia, which is the licensing administration for SES-10 on behalf of CAN, is a WTO-member country, the SES proposal to provide WTO-covered services is subject to the presumption in favor of entry described above.

Allowing SES to use SES-10 to offer FSS to, from, and within the U.S. will promote competition and is otherwise consistent with the *DISCO II* framework. Therefore, the Commission should add SES-10 to the Permitted List for services in the conventional Ku-band.

Furthermore, the Commission applies the same framework that governs requests for addition to the Permitted List to petitions seeking U.S. market access for bands other than the conventional C- and Ku-bands.¹⁰ Accordingly, the Commission should also authorize SES-10 to offer FSS capacity in the United States using spectrum in the extended Ku-band and the Appendix 30A band, subject to earth station-specific licensing. SES recognizes that under the Commission's rules, some of this spectrum is subject to specific requirements, including coordination with the National Telecommunication and Information Administration¹¹ and minimum earth station antenna size specifications.¹² SES will conform to these requirements with respect to operations of SES-10.

⁹ *Id.* at ¶¶ 25 & 30.

¹⁰ *See DISCO II* at ¶ 192.

¹¹ *See* 47 C.F.R. § 2.106, Footnote US337.

¹² *See* 47 C.F.R. § 2.106, Footnote US356.

B. DTH Operations

In *DISCO II*, the Commission adopted the “ECO-Sat” test for services such as DTH that are excluded from the U.S. commitments in the WTO Telecom Agreement.¹³ That test requires a determination whether U.S.-licensed satellites have “effective competitive opportunities” in the relevant foreign markets to provide analogous services.¹⁴ Under the Commission’s rules, the relevant foreign markets for this test are (i) the country in which the non-U.S.-licensed satellite is licensed; and (ii) the countries in which communications with U.S. earth stations will originate or terminate.¹⁵ To assess compliance with the ECO-Sat test, the Commission looks at whether there are *de jure* or *de facto* barriers to entry for U.S. satellite operators seeking to provide comparable services in the relevant foreign jurisdiction.¹⁶

In this instance, SES is seeking authority to use conventional Ku-band capacity on SES-10 to provide DTH services within the U.S. and between the U.S. and various countries in North, Central, and South America and the Caribbean that are listed in Annex 1 hereto. All of these countries satisfy the ECO-Sat test.

Colombia. Colombia, which is the licensing administration for SES-10 on behalf of the Andean Community, passes the ECO-Sat test. There are no *de jure* or *de facto* barriers in Colombia to U.S. satellite operators wishing to provide capacity for DTH service. In order to gain access to the Colombian market, a local entity must be established and register the satellite

¹³ *DISCO II* at ¶ 98.

¹⁴ *Id.* at ¶ 99.

¹⁵ *See* 47 C.F.R. § 25.137(a).

¹⁶ *DISCO II* at ¶ 75.

to be used for DTH operations.¹⁷ However, this is not a barrier to DTH operations using non-Colombian satellites. For example, DIRECTV provides video programming directly to subscribers in Colombia,¹⁸ and SES understands that it uses U.S.-licensed satellites for that offering. Accordingly, authorizing SES-10 to offer DTH service within the U.S. and between the U.S. and Colombia is consistent with *DISCO II*.

Mexico and Argentina. Mexico and Argentina pass the ECO-Sat test. The U.S. has entered into bilateral agreements with the governments of Mexico¹⁹ and Argentina²⁰ that permit U.S.-licensed satellites to provide FSS including DTH service in those countries provided that licensing and coordination conditions are met. Accordingly, allowing SES-10 to provide DTH capacity to Mexico and Argentina is consistent with *DISCO II*.²¹

Brazil, Netherlands Antilles, Guatemala, Honduras, Nicaragua and U.K.

Territories in the Caribbean. The Satellite Division has previously found that the ECO-Sat test is

¹⁷ Law 1341 (2009), Principles and Concepts on Information Society and Organization of Information and Communications Technologies, Title II (Col.).

¹⁸ See https://www.directvla.com/about_en.aspx (last visited Dec. 23, 2015).

¹⁹ See Protocol Concerning the Transmission and Reception of Signals from Satellites for the Provision of Direct-to-Home Satellite Television Services in the United States of America and the United Mexican States, November 8, 1996.

²⁰ See Agreement Between the Government of the United States of America and the Government of the Argentine Republic Concerning the Provision of Satellite Facilities and the Transmission and Reception of Signals to and from Satellites for the Provision of Satellite Services to Users in the United States of America and the Republic of Argentina, June 5, 1998.

²¹ See *DISCO II*, 12 FCC Rcd at 24157 (there is no need for an inquiry into effective competitive opportunities where a bilateral agreement is in place with respect to the relevant service). See also *EchoStar Satellite LLC*, 21 FCC Rcd 4077, 4080 (Sat. Div. 2006) at ¶ 8 & n.20 (in light of U.S.-Mexico bilateral agreement, “no further market access analysis is required” under *DISCO II* in order to authorize U.S.-licensed earth stations to communicate with satellite operating under Mexican authority for DTH services); *New Skies Satellites N.V.*, Call Sign S2828, File No. SAT-PPL-20110620-00112, grant-stamped Mar. 15, 2012 (“SES-4 Grant”), Attachment at 1.

satisfied for DTH with respect to Brazil²² and with respect to the Netherlands Antilles, Guatemala, Honduras, Nicaragua, Bermuda, the British Virgin Islands, and the Cayman Islands route markets.²³

Other Central American Countries. There are no *de jure* or *de facto* barriers in Belize, Costa Rica, El Salvador, or Panama to U.S. satellite operators wishing to provide capacity for DTH service. None of these countries requires that a satellite be granted landing rights prior to commencing service. Furthermore, SES understands that video services are provided to customers using U.S.-licensed satellites in Costa Rica,²⁴ El Salvador,²⁵ and Panama.²⁶

Other Caribbean Jurisdictions. There are no *de jure* or *de facto* barriers in Antigua and Barbuda, the Bahamas, Barbados, the Turks and Caicos Islands, Anguilla, Montserrat, Dominica, the Dominican Republic, Grenada, Guadeloupe, Martinique, Saint Martin, Saint Barthelemy, Haiti, Jamaica, St. Vincent and the Grenadines, St. Kitts and Nevis, St. Lucia, or Trinidad and Tobago to U.S. satellite operators wishing to provide capacity for DTH service. None of these countries requires that a satellite be granted landing rights prior to commencing

²² See *Hispamar Satelites, S.A.*, Call Sign S2622, File No. SAT-MOD-20040628-00124, grant-stamped Aug. 26, 2004 (modifying the Permitted Space Station List entry for the Brazilian-licensed Amazonas-1 satellite to permit the provision of DTH service to, from, or within the U.S.); *Hispamar Satelites, S.A.*, Call Sign S2793, File Nos. SAT-PPL-20100506-00093 & SAT-APL-20101209-00257, grant-stamped Dec. 21, 2010; grant reissued Jan. 7, 2011 (same with respect to Amazonas-2). See also SES-4 Grant, Attachment at 1.

²³ See *SES Americom, Inc.*, Call Sign S2676, Consent to Assignment, File No. SAT-ASG-20080609-00120 (grant-stamped Aug. 6, 2008) (“AMC-21 Grant”), Attachment at 3; SES-4 Grant, Attachment at 1.

²⁴ See <http://www.skycostarica.net/> (last visited Nov. 16, 2015).

²⁵ See <http://skyelsalvadortv.com/index.html> (last visited Nov. 16, 2015).

²⁶ See <http://www.sky.com.pa/> (last visited Dec. 23, 2015).

service. The Turks and Caicos Islands, Anguilla, and Montserrat are off-shore territories of the United Kingdom; Guadeloupe, Martinique, and Saint Barthelemy are off-shore territories of France; and Saint Martin is divided into French and Netherlands territories. As such, these jurisdictions are subject to a European Union (“EU”) directive specifying that “Member States shall ensure that any regulatory prohibition or restriction on the offer of space segment capacity to any authorised satellite earth station network operator are abolished.”²⁷ Furthermore, SES understands that video services are currently provided to customers using U.S.-licensed satellites in the Dominican Republic²⁸ and in Barbados, Curacao, Jamaica and Trinidad & Tobago.²⁹

Other South American Countries. There are no *de jure* or *de facto* barriers in Bolivia, Chile, Ecuador (including the Galapagos Islands), the Falkland Islands, French Guiana, Guyana, Paraguay, Peru, Suriname, Uruguay, or Venezuela to U.S. satellite operators wishing to provide capacity for DTH service. The Falkland Islands, Chile, French Guiana, Guyana, and Suriname do not require that a satellite be granted landing rights prior to commencing service. The Falkland Islands are off-shore territories of the United Kingdom, and French Guiana is an off-shore territory of France. As such, these jurisdictions are subject to the EU directive discussed above. A landing rights authorization is required in order to gain market access in Bolivia, Ecuador, Paraguay, Peru, and Uruguay, and notification to CONATEL is required in order to serve Venezuela, but these obligations do not pose a barrier to DTH operations using U.S.-licensed satellites. For example, SES Americom operates Commission-licensed satellites

²⁷ Commission Directive 2002/77/EC, 16 September 2002 on competition in the markets for electronic communications networks and services, OJ L249, Article 7(1) at 21.

²⁸ See http://s1.q4cdn.com/453653659/files/doc_financials/annual/2014/Directv_2014-Annual-Report_v001_b60c3u.pdf at 14.

²⁹ See <http://www.directvcaribbean.com/re/> (last visited Dec. 23, 2015).

that have been permitted to provide service in Bolivia, Ecuador, Paraguay, Peru, and Uruguay. Furthermore, SES understands that video services are provided to customers using other U.S.-licensed satellites in Chile, Ecuador, Peru, Uruguay and Venezuela.³⁰

In sum, U.S.-licensed operators have effective competitive opportunities to provide DTH transmission capacity in Colombia and the other countries listed in Annex 1. Thus, the ECO-Sat test is satisfied for both the home and route markets for DTH service by SES-10. Accordingly, SES respectfully requests that the Commission authorize the use of SES-10 for DTH services to, from, and within the U.S. and on the route markets addressed herein.

III. RULE WAIVERS ARE WARRANTED FOR SES-10

SES seeks limited waivers of the Commission's rules in connection with the petition for SES-10 U.S. market access authority. Grant of these waivers 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.³¹

SES-10 substantially complies with the Commission's rules, but certain waivers are necessary in light of the frequencies used and the technical characteristics of the spacecraft. The Commission has granted similar waivers in other cases. As shown below, SES-10 will

³⁰ See https://www.directvla.com/about_en.aspx (last visited Dec. 23, 2015).

³¹ *PanAmSat Licensee Corp.*, 17 FCC Rcd 10483, 10492 (Sat. Div. 2002) (footnotes omitted).

allow SES to continue and expand its services at the 67° W.L. orbital location, and grant of the requested waivers will therefore serve the public interest.

Section 2.106 and Footnotes US271 and NG52: The Table of Allocations in Section 2.106 and the associated footnotes include limitations on the use of some of the frequency bands that will be included on SES-10. SES seeks limited waivers of these restrictions as discussed below. Waivers of the Table of Allocations are generally granted “when there is little potential for interference into any service authorized under the Table of Frequency allocations and when the nonconforming operator accepts any interference from authorized services.”³² The SES waiver requests meet this test.

First, SES seeks a waiver of Section 2.106 and footnote US271 to permit SES-10 to use the 17.3-17.55 GHz band, which is allocated for the fixed-satellite service but limited to use by broadcasting-satellite service (“BSS”) feeder links, to provide FSS uplinks on an unprotected, non-interference basis in the United States and its territories located within ITU Region 2. Grant of a waiver is consistent with Commission precedent. For example, in authorizing the Intelsat 29e spacecraft to use the 17.3-17.55 GHz frequency band for FSS at the 50° W.L. orbital location, the Commission noted that FSS operations in this spectrum conform to No. 5.492 of the ITU Radio Regulations and that the nearest BSS spacecraft was at 61.5° W.L.³³ At 67° W.L., the SES-10 spacecraft will be located 2.2° from the nearest BSS Feeder link Plan assignment and 5.5° from the nearest operational BSS Feeder links at the nominal 61.5° W.L. location. Unlike the BSS downlink band where small earth station antennas are in operation,

³² See *The Boeing Company*, 16 FCC Rcd 22645 (IB & OET 2001) at 22651 & n.48 (citing cases).

³³ *Intelsat License LLC*, Call Sign S2913, File Nos. SAT-LOA-20130722-00097 & SAT-AMD-20140718-00087, grant-stamped May 21, 2015 (“Intelsat 29e Grant”), Attachment to Grant at 5, ¶ 21.

BSS feeder links are similar to other FSS operations using large earth station antennas that can share on a roughly two degree spacing basis. Moreover, SES is providing in the attached Technical Appendix an MSPACE analysis demonstrating that the proposed SES-10 operations will not cause harmful interference to nearby BSS networks. Thus, granting a waiver will not undermine Commission policy because BSS operations will be fully protected.

Second, SES seeks a waiver of footnote NG52 to permit the reception of U.S. domestic services in the 10.95-11.2 GHz and 11.45-11.7 GHz bands on an unprotected, non-interference basis. Footnote NG52 was intended to preserve access to the 10.7-11.7 GHz spectrum for terrestrial fixed service (“FS”) stations by limiting FSS use of the band to international operations only.³⁴ The Commission has granted waivers of this limitation where the FSS applicant demonstrated that its transmissions would comply with power-flux-density (“pfd”) limits on the ground to protect FS operations and has committed to accepting any interference from existing or future FS networks.³⁵ As the Commission explained in a prior case granting an EchoStar entity a waiver of footnote NG104:

waiver of footnote NG 104 would not undermine the rule’s purpose because it involves only passive receive-only earth stations that are not capable of causing interference into FS stations operating in this band. Further, because, EchoStar has agreed to accept any level of interference from FS stations into its receive-only earth stations’ operations in the extended Ku-bands, FS operators will not be required to coordinate their station operations with the EchoStar receive-only earth stations’ operations. Under these circumstances, we determine that additional coordination burden would not be placed upon FS operators and that their ability to expand service in the future would not in

³⁴ See 47 C.F.R § 2.106, Footnote NG52. This policy was previously codified in footnote NG104.

³⁵ See, e.g., Intelsat 29e Grant, Attachment to Grant at 4-5, ¶ 20.

any manner be restricted.³⁶

The SES request for authority to allow U.S. earth stations to receive domestic signals from SES-10 in the 10.95-11.2 GHz and 11.45-11.7 GHz bands on an unprotected basis fits squarely within this line of precedent. Accordingly, the Commission should conclude that grant of the requested waiver will serve the public interest.

Section 25.210(i)(1): SES also seeks any necessary waiver of Section 25.210(i)(1), which sets a 30 dB minimum for cross-polarization isolation performance in the primary coverage area of a satellite using FSS frequencies.³⁷ The design specification for SES-10 in the FSS frequency bands provides for a minimum cross-polarization isolation of 27 dB, and although that level is exceeded in most of the coverage area, the edge of coverage levels are below 30 dB in some beams.

The Commission has recently determined that the FSS cross-polarization requirement is no longer necessary,³⁸ and Section 25.210(i)(1) will therefore be deleted when the Part 25 Second Order takes effect. Moreover, the Commission has routinely granted waivers of Section 25.210(i)(1) based on a finding that the primary effect of any increased interference is on

³⁶ *EchoStar KuX Corp.*, 20 FCC Rcd 919, 923 (Sat. Div. 2004). *See also Intelsat North America LLC*, Call Sign S2817, File No. SAT-LOA-20101014-00219, grant-stamped July. 26, 2011, Attachment to Grant at 23, ¶¶ 7-9 (granting waiver of footnote NG104 to allow Intelsat 18 to provide domestic service in the 10.95-11.2 GHz and 11.45-11.7 GHz bands); *PanAmSat Licensee Corp.*, Call Sign S2381, File No. SAT-MOD-20060303-00019, grant-stamped Oct. 26, 2006, Attachment to Grant at 1-2, ¶¶ 1-4 (granting waiver of footnote NG104 to allow Galaxy 3C to provide domestic service in the 11.45-11.7 GHz band).

³⁷ 47 C.F.R. § 25.201(i)(1).

³⁸ *See Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Second Report and Order, IB Dkt No. 12-267, FCC 15-167 (rel. Dec. 17, 2015) (“Part 25 Second Order”) at §§ 331-333.

the satellite operator itself,³⁹ which can manage the interference internally. Accordingly, if Section 25.210(i)(1) is still in effect when the Commission acts on this petition, granting a waiver of the rule for SES-10 is consistent with applicable precedent.

IV. CONCLUSION

For the foregoing reasons, SES respectfully requests that the Commission: (i) add SES-10 to the Permitted List for FSS operations and TT&C in the conventional Ku-band, (ii) authorize use of SES-10 conventional Ku-band capacity for DTH service within the United States and between the U.S. and the other markets identified herein; and (iii) permit use of the SES-10 capacity in the extended Ku-band and Appendix 30A band for FSS subject to earth station-specific licensing.

Respectfully submitted,

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³⁹ See, e.g., SES-4 Grant, Attachment at 2 (waiving Section 25.210(i) for SES-4 based on a finding that shortfalls in the cross-polarization isolation performance “will not produce a significant increase in interference, except to the space station itself, and will not adversely affect any other operator.”).

ANNEX 1: Route Markets for DTH

Central America:

1. Belize
2. Costa Rica
3. El Salvador
4. Guatemala
5. Honduras
6. Mexico
7. Nicaragua
8. Panama

Caribbean:

1. Antigua and Barbuda
2. Bahamas
3. Barbados
4. Bermuda
5. Cayman Islands, Turks and Caicos, British Virgin Islands, Anguilla, Montserrat (U.K.)
6. Dominica
7. Dominican Republic
8. Grenada
9. Guadeloupe, Martinique, Saint Martin, Saint Barthelemy (France)
10. Haiti
11. Jamaica
12. Netherlands Antilles (Netherlands)
13. St. Vincent and the Grenadines
14. St. Kitts and Nevis
15. St. Lucia
16. Trinidad and Tobago

South America:

1. Falkland Islands (UK)
2. Argentina
3. Bolivia
4. Brazil
5. Chile
6. Colombia
7. Ecuador (including Galapagos Islands)
8. French Guiana (France)
9. Guyana
10. Paraguay
11. Peru
12. Suriname
13. Uruguay
14. Venezuela