**** EXPEDITED PROCESSING REQUESTED ****
SES Americom, Inc.
Request for Special Temporary Authority
SES-2; Call Sign: S2826

SES Americom, Inc. ("SES") herein requests 60 days of Special Temporary Authority ("STA"), commencing upon grant but no later than Tuesday, September 1, 2026, to operate SES-2 (S2826) at 87.0 W.L. with a +/- 0.1° East/West station-keeping box and with Ku-band coverage flexibility. SES-2 is permanently licensed to operate at 87.0° W.L. with coverage different from that requested herein.[1] SES has filed a modification application requesting permanent authority for these operations.[2] All other parameters will remain unchanged from those contained in SES-2's current authorization.[3]

Specifically, SES requests (1) a waiver of 47 C.F.R. 25.210(j) to permit operating SES-2 with a +/- 0.1° station-keeping box; and (2) authority to change the pointing of SES-2's Ku-band beam to better meet changing customer demands. SES seeks limited flexibility to repoint the KRH, KRV, KTH and KTV beams on file with the Federal Communications Commission ("Commission" or "FCC") within the envelope defined by the redline in the coverage map provided in Attachment A. Attachment A provides a composite isoline of the 8 dB below peak contour of all prospective pointings of the beams. All operations within this contour will be consistent with applicable Commission rules and coordination agreements.

Grant of this STA request will enable SES to optimize SES-2's configuration to better meet customer requirements and will not result in increased risk of harmful interference. SES will continue to operate SES-2 in conformance with existing coordination agreements and the Commission's rules governing operations vis-à-vis adjacent locations. In the unlikely event that any harmful interference should occur, SES will take all reasonable steps to eliminate such interference. The point of contact for any reports of harmful interference is SES's Satellite Operations Center on 703-559-7701 or +352 710 725 4353.

Request for Waiver of Section 25.210(j). SES requests waiver of Section 25.210(j) of the Commission's rules to operate SES-2 with an East/West station-keeping tolerance of +/- 0.1° instead of +/- 0.05°. This waiver request is consistent with SES's pending modification application for SES-2.[4]

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[1] *See SES Americom, Inc*. Grant, ICFS File Nos. SAT-RPL-20110429, SAT-AMD-20110613-00107 (granted Sept. 1, 2011) ("*SES-2 Authorization*").

[2] *See* SES Americom, Inc. Modification Request, ICFS File No. SAT-MOD-20260814-00338 (filed Aug. 14, 2026) ("Modification Request").

[3] *See SES-2 Authorization*.

[4] *See* Modification Request at 3-5.

Under Section 1.3 of the Commission's rules, the Commission has authority to waive its rules "for good cause shown."[5] Good cause exists if "special circumstances warrant a deviation from the general rule and such deviation will serve the public interest" better than adherence to the general rule.[6] In determining whether waiver is appropriate, the Commission should "take into account considerations of hardship, equity, or more effective implementation of overall policy."[7] Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists to waive the +/- 0.05° East/West station-keeping requirement and authorize SES-2 to instead operate within a 0.1° station-keeping box. The Commission has previously waived this rule based on a finding that allowing an increased station keeping volume would "not adversely affect the operations of other spacecraft and would conserve fuel for future operations."[8]

The present request falls squarely within the Commission's precedents. Increasing the satellite's East/West tolerance would conserve fuel because the need for eccentricity maneuvers would be significantly reduced. The resulting fuel savings will maximize the use of the satellite and promote the continued efficient use of orbital resources. In addition, allowing a 0.1° station-keeping box would not adversely affect the operation of other spacecraft. A list of known operational satellites within ± 6° of the 87.0° W.L. orbital location is provided in the table below:

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[5] 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

[6] *N.E. Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

[7] *WAIT Radio*, 418 F.2d at 1159.

[8] *See, e.g.*, *Application of Intelsat License LLC to Modify Authorization for Intelsat 902 (S2406)*, ICFS File No. SAT-MOD-20240430-00091, Stamp Grant ¶ 19 (granted June 26, 2024) (waiving Section 25.210(j) of the Commission's rules); *Petition of Intelsat License LLC for Declaratory Ruling to Add HISPASAT 143W-1 to the Permitted Space Station List for Ku- and S-band Operations at 143° W.L.*, ICFS File No. SAT-PDR-20191205-00143, Stamp Grant ¶ 19 (granted Apr. 29, 2020) (waiving same because "operating HISPASAT 143W-1 at a ± 0.1° station-keeping tolerance will have no adverse impact on other operators" and "will also allow Intelsat to conserve fuel and extend the life of HISPASAT 143W-1"); *Application of SES Americom, Inc. for Modification of Satcom SN-4 Fixed Satellite Space Station License*, 20 FCC Rcd 11542, ¶¶ 10-14 (2005) (agreeing with SES "that increasing the station-keeping volume of the Satcom SN4 spacecraft will not adversely affect the operations of other spacecraft, and would conserve fuel for future operations").

Satellite Name	Orbital Location	Operator
Arsat-2	81.0° W.L.	ARSAT
Nimiq 4	82.0° W.L.	Telesat
Astranis Aero East	83.1° W.L.	Spacing Guild UK Limited
Astranis Aero West	83.1° W.L.	Spacing Guild UK Limited
Star One D1	84.0° W.L.	Embratel
Galaxy 17	85.0° W.L.	Intelsat (SES)
XM-3	85.15° W.L.	XM Radio
XM-4	85.15° W.L.	XM Radio
SXM-8	85.15° W.L.	Sirius XM Radio
SXM-9	85.15° W.L.	Sirius XM Radio
FM-5	86.15° W.L.	Sirius XM Radio
SES-2	87.0° W.L.	SES
Tupac Katari 1	87.2° W.L.	Bolivian Space Agency
VIASAT-3	88.9° W.L.	ViaSat
Galaxy 36	89.0° W.L.	Intelsat (SES)
Galaxy 32	91.0° W.L.	Intelsat (SES)
Intelsat 40e	91.0° W.L.	Intelsat (SES)
Nimiq 6	91.1° W.L.	Telesat
DBSD G1	92.85° W.L.	New DBSD Satellite Services

Operating SES-2 with a 0.1° station-keeping box will have a negligible impact on the interference environment for adjacent satellites. SES's proposed operations will not cause any more interference or require any more interference protection than a satellite operating within a 0.05° station-keeping box and will in any event conform with all applicable coordination agreements and the Commission's rules governing operations vis-à-vis adjacent locations.[9]

Further, SES's operation of SES-2 with a 0.1° station-keeping box will not affect the station-keeping of any other spacecraft. Increasing SES-2's station-keeping box to +/- 0.1° will not overlap with the station-keeping box of any other operational satellite.

Additionally, SES is not aware of any other FCC-licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with SES-2 at 87.0° W.L. Further, SES is not aware of any system with an overlapping station-keeping volume with SES-2 that is the subject of an International Telecommunication Union filing and that is either in orbit or progressing towards launch.

Finally, grant of this STA and waiver request is in the public interest because it will allow SES to operate using flexible Ku-band coverage at the 87.0° W.L. orbital location to better meet customer demand, and to more efficiently utilize the satellite with a 0.1° station-keeping box. For the reasons set forth herein, SES respectfully requests that the Commission grant this STA request.

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[9] *See* 47 C.F.R. §§ 25.140(a)(3)(i)-(iv) (setting forth power limits on uplink and downlink transmissions to ensure compatibility of GSO FSS space stations at two-degree spacing intervals).

Respectfully submitted,

/s/ Daniel C.H. Mah
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cc: Jay Whaley
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Attachment A

SES-2 Composite Isoline