

October 28, 2020

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: **Updated Final Transition Plan of SES Americom, Inc.
Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122
Eligible Satellite Operator Transition Plans for the 3.7-4.2 GHz Band,
GN Docket No. 20-173**

Dear Ms. Dortch:

SES Americom, Inc. ("SES") hereby provides an update to its final Transition Plan to account for earth station lump sum elections and changes to the list of Incumbent Earth Stations.¹

On October 23, 2020, the International Bureau issued two public notices clarifying (1) the list of Incumbent Earth Stations eligible for reimbursement or lump sum elections;² and (2) the list of lump sum elections that have been accepted or require further clarification before they are accepted by the Bureau.³ Based on these two public notices as well as additional decisions by its customers, SES has updated the services identified for transition in Appendix B to its final Transition Plan and the Incumbent Earth Stations that will be transitioned by SES identified in Appendix C to the Plan. The updated Appendix C includes changes in the updated list of Incumbent Earth Stations and excludes all Incumbent Earth Stations associated with an accepted lump sum election. SES continues to include any Incumbent Earth Stations that are subject to a lump sum election that has not yet been accepted by the FCC. SES looks forward to rapid resolution of the pending elections because it will need to order equipment for the affected Incumbent Earth Stations soon if any elections are rejected and they will need to be

¹ *Wireless Telecommunications Bureau Opens Window for Eligible C-Band Satellite Operators to Account for Earth Station Lump Sum Elections in Their Transition Plans*, Public Notice, DA 20-1141 (rel. Sept. 29, 2020).

² *International Bureau Releases Updated List of Incumbent Earth Stations in the 3.7-4.2 GHz Band in the Contiguous United States*, Public Notice, DA 20-1260 (rel. Oct. 23, 2020).

³ *International Bureau Announces Review of Lump Sum Elections*, Public Notice, DA 20-1262 (rel. Oct. 23, 2020).

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transitioned by SES. As the attached document is SES's final Transition Plan reflecting the feedback and input from the FCC, SES is diligently implementing this plan to clear the C-band by the accelerated clearing deadlines. SES has also updated the estimated costs identified in Appendix D to reflect the change in Incumbent Earth Stations that will be subject to SES's Transition Plan.

Pursuant to Section 1.1206(b) of the Commission's Rules, this letter is being filed in ECFS in the above-referenced dockets.⁴ Please do not hesitate to contact the undersigned with any questions.

Very truly yours,

/s/ Brian D. Weimer

Brian D. Weimer
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

⁴ See 47 C.F.R. § 1.1206(b).