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A PROFESSIONAL LIMITED LIABILITY COMPANY  
INCLUDING A PROFESSIONAL CORPORATION

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\*ADMITTED IN PENNSYLVANIA ONLY  
PRACTICE RESTRICTED TO MATTERS  
BEFORE FCC AND PTO

\*\*ADMITTED IN D C ONLY

January 24, 1997

Steve Sharkey  
Chief, Satellite Engineering Branch  
Federal Communications Commission  
International Bureau, Earth Stations  
P.O. Box 358160  
Pittsburgh, Pennsylvania 15251-5160

Re: Amendment to Request for Special Temporary Authority  
Maritime Telecommunications Network, Inc.  
A&H #1300.13

Dear Mr. Sharkey:

PLEASE NOTE THAT THIS FILING CONTAINS PROPRIETARY INFORMATION. PURSUANT TO SECTION 0.459 OF THE COMMISSION'S RULES, SET FORTH IN DETAIL BELOW, THE APPLICANT HEREBY REQUESTS THAT CERTAIN OF THE ATTACHED INFORMATION AND MATERIALS BE WITHHELD FROM PUBLIC INSPECTION.

Being transmitted, in duplicate, on behalf of Maritime Telecommunications Network, Inc. ("MTN"), is an Amendment to the Request For Special Temporary Authority ("STA Request") filed by MTN on June 28, 1996. That STA Request was filed pursuant to Section 25.119 of the Commission's rules and to the Joint Order of the Chief, International Bureau and Chief, Office of Engineering and Technology, In re Mobile Satellite-Based Communications Services by Crescomm Transmission Services, Inc. and Qualcomm Incorporated, DA-96-650, issued April 29, 1996 ("Waiver Order").

The Amendment being tendered herein has been prepared as the result of conferences held by MTN with the Commission staff on August 29, 1996; October 9, 1996; November 14, 1996; December 12, 1996; and December 19, 1996. In principal part, the Amendment consists of interference coordination studies conducted in connection with proposed Digital Shipboard Earth Station ("DSES")

operations in and around Norfolk, Virginia; San Diego, California; Mayport (Jacksonville) Florida; and Port Canaveral, Florida. The Amendment materials are responsive to the points raised by the Commission's staff in the conferences conducted on the referenced dates.

Also furnished is a White Paper describing the methodology employed in conducting the above four port area studies. The research resulted in findings that the proposed operations, both at pierside and underway, can be conducted by MTN without causing objectionable interference to other licensed users of the studied frequencies.

With respect to dockside operations, the four studies employed the stringent clearance criteria applicable to Fixed Earth Stations. Accordingly, the Amendment proposes operations at pierside that may be conducted on a full-time basis.

The Amendment further seeks authority to operate Digital Shipboard Earth Stations from up to 250 ships within the operating limitations already defined by the Commission in the Waiver Order.

Attached hereto is a fee filing check in the amount of \$130 (Fee Filing Code: CGB) to cover the requisite filing fee.

Pursuant to Section 0.459 of the Commission's Rules, MTN seeks proprietary treatment of certain portions of this Amendment, specifically, Exhibits 1 and 2. The materials contained in those Exhibits represent a very substantial investment of time, research and capital by MTN. Additionally, Exhibits 1 and 2 contain commercial and technical data that would customarily be guarded by MTN from its competitors. The methodology employed by MTN to analyze interference issues, as well as the specific presentation and depiction of graphic materials and maps employed to demonstrate that methodology, constitute a trade secret and contain valuable commercial and technical information that is the unique work product of MTN.

For these reasons, this request for proprietary treatment meets the standards set forth in Section 0.457(d)(2)(i) of the Commission's rules, and MTN accordingly requests, pursuant to Section 0.459 of the rules, that the information and materials contained in Exhibits 1 and 3 be withheld from public inspection.

Steve Sharkey  
Federal Communications Commission

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In accordance with the requirements of Section 0.459(a), the proprietary materials have been physically separated from the rest of this Amendment through the use of page markers clearly delineating the beginning and ending of the proprietary materials.

If there are any questions with request to this Amendment, please communicate with the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert G. Allen", written in a cursive style.

Robert G. Allen

RGA:vn  
Attachment