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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 25, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

*Amendment to  
5633-EX-MR-97*

ATTN: Mr. Douglas Young  
Experimental Licensing Branch  
Office of Engineering & Technology

**Re: Amendment to Application to Modify Experimental License  
Request for Confidential Treatment of Information  
Call Sign KI2XEE  
Maritime Telecommunications Network, Inc.**

Dear Mr. Caton:

Maritime Telecommunications Network, Inc. ("MTN") hereby submits, in triplicate, an amendment to its pending Application for Modified Radio Station Authorization, FCC Form 442, filed on January 24, 1997, associated with previously granted experimental authority to operate Shipboard Earth Stations ("SESS") under Call Sign KI2XEE. (A copy of the January 24, 1997, application is attached.)

**Request for Confidential Treatment of Information.** Pursuant to Section 0.459 of the Commission's Rules, 47 C.F.R. § 0.459, MTN also hereby requests confidential treatment of Exhibit II, Number of Port Visits Made to 17 Ports Between February 1, 1997, and June 30, 1997. MTN submits that the competitively sensitive information included in Exhibit II warrants confidential treatment by the Commission. Release of the information would result in competitive injury to MTN, because unrestricted availability of the details of Exhibit II will provide competitors with trade secrets. Exhibit II is therefore within the scope of Section 0.457(d) of the Commission's Rules, because the information contained therein constitutes "trade secrets" that "would not customarily be released to the public," and thus is afforded protection from public inspection. See 47 C.F.R. § 0.457(d). Accordingly, MTN is transmitting Exhibit II in a sealed envelope attached to paper copies of the Request for Extension of Special Temporary Authority.

*Not necessary for  
grant.*

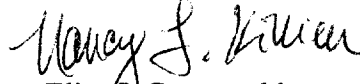
*Returned at request  
of applicant.*

*DJY  
11/21/97*

Mr. William F. Caton  
Mr. Douglas Young  
July 25, 1997  
Page 2

This amendment is necessary to provide additional information requested by the Commission in conjunction with MTN's current and proposed operations. If you have any questions, please do not hesitate to call the undersigned counsel.

Very truly yours,



Eliot J. Greenwald  
Nancy L. Killien

Enclosures

cc: Mr. Thomas P. Stanley, Chief Engineer  
Wireless Telecommunications Bureau

Mr. Steve Sharkey, Chief  
Satellite Engineering Branch  
Satellite Radiocommunications Division  
International Bureau

## Description of Additional Documentation Submitted Herein

MTN hereby provides additional documentation to supplement its pending Application for Modified Radio Station Authorization, FCC Form 442, filed on January 24, 1997, associated with previously granted experimental authority to operate Shipboard Earth Stations ("SESS") under Call Sign KI2XEE. The documentation includes:

- (1) A thorough description of the coordination methodology developed and tested by MTN's consulting engineers, Edwards & Kelcey Wireless, L.L.C. ("EK Wireless") (see Exhibit I), which demonstrates that coordination with terrestrial fixed microwave service stations can be successfully accomplished. Exhibit I also establishes that SES operations can co-exist with terrestrial microwave stations when the interference objective applied in frequency coordination for operations under way closely tracks the short term interference objective, -131 dBW/4kHz, contained in Appendix 28 of the ITU Radio Regulations.
- (2) A chart of the number of passes ships have made in and out of the 17 port areas referenced in item (2) above between February 1, 1997, and June 30, 1997, utilizing MTN's SESSs, without any complaints of harmful interference from terrestrial fixed microwave service licensees, all of whom received prior coordination notices describing in detail MTN's SES operations in the subject areas. This continues MTN's already established record of a lack of reported interference during its six-year history of SES operations. (See Exhibit II.) - returned at request of applicant.
- (3) A written explanation of MTN's need to increase the number of SESSs from 45 to 250, as requested in the pending Application. Grant of this request will permit SES operations to be tested under conditions more closely resembling full capacity use of SESSs to ensure that no harmful interference results to fixed service microwave stations. Given the interference coordination procedures developed by EK Wireless for MTN, and the resulting lack of reported interference to terrestrial microwave stations from MTN's shipboard terminals, MTN believes that an increase in the number of shipboard terminals is justified. (See Exhibit III.) BY  
11/21/97
- (4) A two-degree spacing exhibit, demonstrating MTN's SESSs' compliance with the Commission's Rules under Part 25 designed to prevent interference with terrestrial fixed microwave and satellite space stations due to closer orbital spacing of satellites. See 47 C.F.R. § 25.209. (See Exhibit IV.)
- (5) Certification of the applicant. (See Exhibit V.)