SQUIRE, SANDERS & DEMPSEY L.L.P.

Suite 500
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004-2401

Office: +1.202.626.6600
Fax: +1.202.626.6780

Direct Dial: +1.202.626.6659
cnalda@ssd.com

SQUIRE SANDERS | LEGAL COUNSEL WORLDWIDE

December 17, 2009

ELECTRONIC FILING

James R. Burtle, Chief
Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Panasonic Avionics Corporation – Additional Satellite Points of Contact and Coordination Affidavits; Call Sign WD9XQT (ELS File No. 0339-EX-ST-2009)

Dear Mr. Burtle:

Panasonic Avionics Corporation ("PAC"), by its attorneys, hereby amends its above-referenced application for experimental special temporary authority ("STA") to include Galaxy 17 and Galaxy 19 as satellite points of communication. Further, included with this submission are coordination affidavits from the satellite operator of the Galaxy 17 and Galaxy 19 satellites that reflect adjacent satellite operator consent for the proposed operations. PAC intends to file similar coordination affidavits from the operator of the Horizons 1 satellite later today, and from operators of other requested satellite points of communication shortly.

PAC requests that the above-referenced application be granted as soon as possible and accepts that any near-term grant will be only for communication with the coordinated satellite points of communication. When additional satellite points of communication are coordinated, PAC will submit coordination affidavits and requests that its authority be extended to communicate with such satellites accordingly.

Please feel free to contact the undersigned with any questions.

Sincerely,

PANASONIC AVIONICS CORPORATION

/s/ Carlos M. Nalda

Carlos M. Nalda
Joshua T. Guyan
Squire, Sanders & Dempsey L.L.P.
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Its Attorneys

Enclosure

December 16, 2009

INTELSAT

Federal Communications Commission
International Bureau
445 12th Street, S.W.
Washington, D.C. 20554

To Whom It May Concern:

This letter certifies that Intelsat is aware that Panasonic Avionics Corporation ("PAC") is seeking FCC authorization to access Galaxy 17 at 91° WL, as an authorized point of communication, for its eXConnect Ku-band aeronautical mobile-satellite service (""AMSS") system using transmit/receive antennas that are not strictly compliant with the FCC's antenna gain requirements.[1] However, as described below, the terminals comply with the FCC's two-degree spacing rules by maintaining off-axis EIRP spectral density levels below those set forth in analogous Ku-band earth stations onboard vessels ("ESV") and vehicle-mounted earth stations ("VMES") rules.[2]

Intelsat understands that PAC plans to operate two AMSS antenna types: (i) the MELCO antennas previously operated with the Connexion by Boeing system; and (ii) the Aura LE antenna designed specifically for the eXConnect system and manufactured by EMS Technologies. The MELCO antenna is a mechanically-steered Cassegrain antenna with an elliptical profile that was previously examined by the FCC and authorized for AMSS operations in experimental Call Sign WC2XVE (File No. 0002-EX-PL-2004) and commercial blanket license Call Sign E000723 (File No. SES-MOD-20030512-00639). The Aura LE antenna is a mechanically steered, flat-plate AES with two transmit/receive apertures that is similarly designed to meet the technical requirements imposed on U.S. and international AMSS operations.[3] The basic

[1] *See* 47 CFR §25.209.

[2] *See* 47 CFR §25.222.

[3] The Aura LE antenna's two transmit/receive apertures are coherently combined to form a single beam. At very low elevation angles, only the front aperture is used due to blockage. This allows the antenna to maintain high performance over a large range of elevation angles between 5 degrees and 90 degrees while maintaining a low profile for aerodynamic integration with an aircraft.

characteristics of the MELCO and Aura LE antenna are also summarized in Table 1.

Table 1. Aura LE and MELCO Antenna Characteristics

Characteristic	EMS Aura LE	MELCO Reflector
Frequency	Tx: 14.0 GHz to 14.5 GHz Rx: 10.7 GHz to 12.75 GHz (11.7-12.2 GHz in the U.S.)	Tx: 14.0 GHz to 14.4 GHz Rx: 11.2 GHz to 12.8 GHz (11.7-12.2 GHz in the U.S.)
Aperture Size	2 Apertures of 35" X 6" each	25.6" X 7.7"
EIRP	42.5 dBW @ 5 deg Elevation 48.0 dBW @ 90 deg Elevation	47.2 dBW
G/T	11 dB/K @ 5 deg Elevation 14 dB/K @ 90 deg Elevation	8.0 dB/K @ 11.2 to 11.7GHz 9.3 dB/K @ 11.9 to 12.8GHz
Tracking Rate	40 deg/sec in Azimuth 25 deg/sec in Elevation	40 deg/sec in Azimuth 25 deg/sec in Elevation
Az Pointing Accuracy	0.2 deg 1-sigma	0.25 deg 1-sigma

Both the MELCO and Aura LE antennas are designed to maintain pointing towards the intended satellite through the full range of maneuvers carried out by commercial aircraft. The antennas are pointed based on aircraft position and attitude information obtained from the ARINC 429 data bus, which is standard on commercial aircraft. This information is augmented with higher rated data from an inertial sensor package that is integrated with the antenna and compensates for INS errors that result from latency and bending of the airframe between the aircraft INS unit and the antenna. The pointing accuracy of the MELCO reflector is 0.25 deg 1-sigma and the pointing accuracy of the EMS Aura LE antenna will be less than 0.2 deg 1-sigma. Pointing error will be continuously monitored and if it ever exceeds 0.5 degrees, then transmissions will be automatically inhibited within 100 ms.[4]

The FCC's off axis EIRP spectral density limits for analogous ESV and VMES operations are defined by Sections 25.222(a)(1) and 25.226(a)(1)(i). The effective off-axis EIRP spectral density generated by a conforming terminal will be:

$15-25\log10\ (\Theta + 0.2)$	dBW/4 kHz	for	$1.5° \leq \Theta \leq 7°$
-6	dBW/4 kHz	for	$7° < \Theta \leq 9.2°$
$18-25\log10(\Theta + 0.2)$	dBW/4 kHz	for	$9.2° < \Theta \leq 48°$
-24	dBW/4 kHz	for	$48° < \Theta \leq 85°$
-14	dBW/4 kHz	for	$85° < \Theta \leq 180°$

where Θ is the angle in degrees from the line connecting the focal point of the antenna to the orbital location of the target satellite.

[4] *See* 47 C.F.R. § 25.222(a)(7) (Ku-band ESVs) and § 25.226(b)(1)(iv)(B)(Ku-band VMESs).

The eXConnect system will limit off-axis EIRP spectral density to no more than this level through various means, including: (i) limiting transmit power spectral density by controlling the transmit power of the terminal and by selecting appropriate carrier bandwidths; (ii) controlling the off-axis gain of the antenna along the GSO by inhibiting transmissions when the skew angle exceeds a specified threshold and(iii) controlling pointing error and inhibiting transmissions when the pointing offset exceeds a threshold of 0.5 deg. The specific transmit power, bandwidth and skew angle thresholds will be selected based on the desired terminal transmission rates, coverage area, and satellite performance.

Based on the foregoing factors, the MELCO antenna will operate at a maximum input power density at the antenna waveguide flange of -21.6 dBW /4 kHz, employing BPSK modulation; and the Aura LE antenna will operate at a maximum input power density at the antenna waveguide flange of -15.1 dBW /4 kHz, employing BPSK modulation. Even in the rare circumstance when transmitting at pointing offsets equivalent to their design tolerances, these antenna terminals are compliant with the off-axis EIRP density level requirements specified in Sections §25.222 and §25.226, or the combined effect of §25.209 and §25.212(c) of the Commission's Rules, at all off-axis angles up to and including 6 degrees off-axis angle. PAC's conservative approach of including antenna pointing offsets in selecting the maximum power levels defined above ensures that the operation of these antennas, with the associated off-axis EIRP density envelope, will not cause unacceptable interference into adjacent satellites.

The undersigned further certifies that the maximum downlink satellite EIRP density of 13.0 dBW/4KHz, operational level of the Ku-band AMSS network operated by PAC, is routinely used at 2-degree spacing without causing unacceptable interference to adjacent satellite operators.

Furthermore, in order to prevent unacceptable interference into adjacent satellites, Horizons and PAC acknowledge that the antennas will be installed in compliance with the technical, operational and performance requirements of Part 25 of the FCC Rules and any requirements set forth in the licenses granted by the FCC for the above AMSS antenna system.

Horizons and PAC confirm that the use of the above antennas will not cause unacceptable interference into adjacent satellites in accordance with the FCC's two-degree spacing policy and accept that these antennas will not require more protection from adjacent satellites compared to an earth station employing an antenna conforming to the FCC antenna performance standards defined in Section 25.209 of the FCC rules. If the use of this antenna should cause unacceptable interference into other systems, PAC has agreed that it will terminate transmission immediately upon notice from the affected parties.

Sincerely,

Jose Albuquerque — 16 December 2009

Jose Albuquerque
Senior Director, Spectrum Engineering
Intelsat

Date

Acceptance by Panasonic Avionics Corporation:

PAC testifies that the information provided to Intelsat and reflected in this affidavit is true and accurate to the best of PAC's knowledge.

Paul Saraffe — Dec. 16, 2009

Paul Saraffe
Panasonic Avionics Corporation
eXConnect Systems Engineering

Date

Acceptance by SES Americom:

SES Americom agrees to the use of the PAC MELCO and Aura LE antennas with the above power density into the antenna flange and the uplink EIRP density level as stated in this letter, with respect to SES satellites and the associated satellite networks that are within +/- 6 degrees orbital spacing from Galaxy 17 at 91° WL.

K. Jonnalagadda — 16 Dec 09

Krish Jonnalagadda
Manager, Spectrum Development
SES Americom

Date

December 16, 2009

INTELSAT.

Federal Communications Commission
International Bureau
445 12th Street, S.W.
Washington, D.C. 20554

To Whom It May Concern:

This letter certifies that Intelsat is aware that Panasonic Avionics Corporation ("PAC") is seeking FCC authorization to access Galaxy 19 at 97° WL, as an authorized point of communication, for its eXConnect Ku-band aeronautical mobile-satellite service (""AMSS") system using transmit/receive antennas that are not strictly compliant with the FCC's antenna gain requirements.[1] However, as described below, the terminals comply with the FCC's two-degree spacing rules by maintaining off-axis EIRP spectral density levels below those set forth in analogous Ku-band earth stations onboard vessels ("ESV") and vehicle-mounted earth stations ("VMES") rules.[2]

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The undersigned further certifies that the maximum downlink satellite EIRP density of 13.0 dBW/4KHz, operational level of the Ku-band AMSS network operated by PAC, is routinely used at 2-degree spacing without causing unacceptable interference to adjacent satellite operators.

Furthermore, in order to prevent unacceptable interference into adjacent satellites, Horizons and PAC acknowledge that the antennas will be installed in compliance with the technical, operational and performance requirements of Part 25 of the FCC Rules and any requirements set forth in the licenses granted by the FCC for the above AMSS antenna system.

Horizons and PAC confirm that the use of the above antennas will not cause unacceptable interference into adjacent satellites in accordance with the FCC's two-degree spacing policy and accept that these antennas will not require more protection from adjacent satellites compared to an earth station employing an antenna conforming to the FCC antenna performance standards defined in Section 25.209 of the FCC rules. If the use of this antenna should cause unacceptable interference into other systems, PAC has agreed that it will terminate transmission immediately upon notice from the affected parties.

Sincerely,

Jose Albuquerque

Jose Albuquerque
Senior Director, Spectrum Engineering
Intelsat

16 December 2009
Date

INTELSAT.

Acceptance by Panasonic Avionics Corporation:

PAC testifies that the information provided to Intelsat and reflected in this affidavit is true and accurate to the best of PAC's knowledge.

Paul Saraffe

Paul Saraffe
Panasonic Avionics Corporation
eXConnect Systems Engineering

Dec 16, 2009
Date

Acceptance by SES Americom:

SES Americom agrees to the use of the PAC MELCO and Aura LE antennas with the above power density into the antenna flange and the uplink EIRP density level as stated in this letter, with respect to SES satellites and the associated satellite networks that are within +/- 6 degrees orbital spacing from Galaxy 19 at 97° WL.

K. Jonnalagadda

Krish Jonnalagadda
Manager, Spectrum Development
SES Americom

16 Dec 09
Date