

13 January 2009

RECEIVED - FCC

JAN 13 2009

Federal Communications Commission
Bureau / Office

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

Re: Application of Lockheed Martin Corporation to Renew its License for Call
Sign WD2XJH, File No. 0234-EX-RR-2008

Dear Mr. Burtle,

By this letter, Lockheed Martin Corporation ("Lockheed Martin") responds to the December 16, 2008 letter from SkyTerra LP ("SkyTerra") concerning Lockheed Martin's above-referenced application for renewal of its Experimental Radio Service license, Call Sign WD2XJH. See Letter dated Dec. 16, 2008, from SkyTerra, LP to James Burtle, Chief, Experimental Licensing Branch, OET, in File No. 0234-EX-RR-2008 ("SkyTerra Letter"). SkyTerra seeks to have the Commission impose a number of new conditions on Lockheed Martin's operations, that have been on-going since 2004, under Call Sign WD2XJH. For the reasons stated below, Lockheed Martin opposes these requested conditions as both unjustified and unnecessary.

In its application in File No. 0234-EX-RR-2008, Lockheed Martin seeks to *renew* an experimental license that was originally granted by the Commission in September of 2004. This is not an application for new or modified technical authority. Since the grant of the WD2XJH license, Lockheed Martin has performed integration and capabilities testing of the F16 fighter aircraft consistent with the parameters of that license.

Lockheed Martin has received no reports of interference from transmissions under this license since the original grant in 2004. As the technical parameters of the renewal application remain identical to those currently licensed and used, there is no reason to expect that interference would occur in the future. In this regard, Lockheed Martin suggests that SkyTerra's Letter may be premised solely on partial frequency overlap with the mobile-satellite service systems of SkyTerra and its Canadian joint venture partner, rather than any interference concerns or incidents that are specific to Lockheed Martin's operations under Call Sign WD2XJH. Furthermore, Lockheed Martin remains cognizant of the Commission rules that require an experimental licensee to cease operation immediately if transmissions conducted under that license cause harmful interference to a licensed entity.

Given the above reasoning, Lockheed Martin urges the Commission to conclude that there is no basis for imposition of the conditions SkyTerra proposes for the renewal of the longstanding license under Call Sign WD2JXH. Therefore, we request that the Commission reject the conditions proposed in the SkyTerra Letter.

Please advise if you have any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jennifer Warren", with a stylized flourish at the end.

Jennifer Warren
Vice President, Technology Policy
and Regulation

CERTIFICATE OF SERVICE

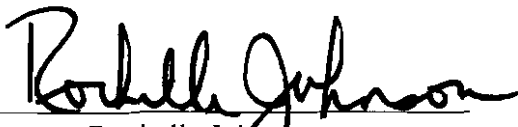
I, Rochelle Johnson, herby certify that on this 13th day of January 2009, I served a true copy of the foregoing Response of Lockheed Martin Corporation to SkyTerra LP's December 16, 2008 letter concerning Lockheed Martin's Application to Renew Its License for Call Sign WD2XJH, File No. 0234-EX-RR-2008, by first-class United States mail, postage prepaid, upon the following:

James Burtle *
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Ira Keltz *
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Behnam Ghaffari *
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Jennifer A. Manner
SkyTerra LP
10802 Parkridge Boulevard
Reston, VA 20191



Rochelle Johnson

*Hand served