From: Matt Baker

To: Behnam Ghaffari
Date: March 12, 2014

Subject:

Message:

Mr. Nweke,

In conjunction with FCC Application Number 0338-EX-PL-2013 and the previously submitted Confidentiality Request, Millennium Space Systems submits the following response with regards to Millennium Space Systems effort in support of the SPace-based High-resolution Imagery Network eXperience (SPHINX) satellite bus. Filed on May 13th, 2013, Millennium Space Systems had requested use of the Mobile Satellite Services 1.6/2.4 GHz band. After 10 months of waiting, the application was dismissed without prejudice on March 10th, 2014, stating:
“You are advised that the Commission is unable to grant your application for the facilities requested. The frequencies being requested i.e., 1610-1645.5 MHz and 2483.5-2500 MHz bands, are heavily used by licensed systems (Iridium, Globalstar, Inmarsat) under Part 25. Given the nature of operations in these bands, it would be very difficult for Millennium Space Systems to operate in these bands without interfering with the existing licensed systems.”

Millennium Space Systems believes that access to this band has been unjustly denied based on:

§5.3(a)/(c)/(d)/(e) and §5.51- This application is for an experimental radio system to be tested in conjunction with a technical demonstration of the SPHINX system

§5.84- Operations analysis has shown no known harmful interference with other systems in band

§5.95- No informal rejections were received. Additional information was asked on July 1st 2013 and responded to on the same day, but did not indicate any issues with the application.

§5.302- Millennium Space Systems is an eligible candidate for experimental licenses per this section as the experiment is to be conducted with Millennium Space System’s full monitoring and control.

While it might be “very difficult” to operate in the requested bands, Millennium Space Systems believes we have the ability to do so without interfering with existing allocations and we formally request the FCC further review and/or provide explanation before dismissing without prejudice.

Respectfully,

Peter Dohm
Senior RF Engineer
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