

July 20, 2007

VIA ELECTRONIC FILING

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

**Re: Request for Expedited Treatment -- Application for Experimental
Special Temporary Authority of Raysat Antenna Systems, LLC,
File No. 0327-EX-ST-2007**

Dear Mr. Burtle:

Raysat Antenna Systems, LLC ("RAS"), by its attorneys, hereby files this formal request for expedited treatment of its application for experimental special temporary authority ("STA"), File No. 0327-EX-ST-2007. As described in the application narrative and in related correspondence with your office, RAS seeks grant of the STA to continue certain experimental land mobile-satellite operations for U.S. government customers and other users during the pendency of an earth station application filed with the International Bureau.^{1/} Such operations are currently conducted under experimental authority granted to RaySat, Inc., an affiliate of RAS, which expires on August 1, 2007.^{2/}

RAS's StealthRay antenna, which has been operating without incident for more than two years under experimental authority, supports critical U.S. government, military and homeland security missions. Some of the ongoing and planned operations supported by RAS include:

- DataPath (one of RAS's resellers) plans to participate in a U.S. Navy and Marine Corps operational exercise called "Seahawk" that commences on August 11, 2007 and continues for two weeks. DataPath has developed a vehicle that includes the StealthRay antenna to provide Satcom-on-the-Move ("SOTM"). The vehicle will provide two-way, broadband satellite

^{1/} See Application Narrative, File No. 0327-EX-ST-2007; *see also* electronic correspondence from Carlos M. Nalda to James R. Burtle, Julius Knapp and Ira Keltz (dated June 8, 2007 and June 21, 2007).

^{2/} See Call Sign WD2XTB, File No. 0135-EX-ML-2005.

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communications between ships offshore and Marine Corps ground elements, including while being driven through the operational area along the Pacific coast. If the U.S. Navy and Marine Corps cannot conduct the evaluation of the DataPath solution, the effectiveness of this exercise will be seriously impaired.

- Through a subcontract with RAS, General Dynamics is employing the StealthRay antenna to provide SOTM on a U.S. Marine Corps project known as Mobile Marine Command and Control ("M2C2"). SOTM is urgently required by U.S. and allied forces in Iraq because they cannot otherwise communicate via satellite without stopping their vehicles and setting up a fixed VSAT antenna. Of course, this dramatically increases troop vulnerability and use of the StealthRay antenna is anticipated to be a major improvement in force protection. Ongoing testing of M2C2 is being conducted in the United States, so experimental authority is required to continue this important military project.
- RAS has assisted the U.S. Army's Battle Command Battle Laboratory in evaluating the StealthRay antenna to provide SOTM for U.S. Army units, in particular the XVIIIth Airborne Corps, scheduled for deployment later this year. These Army units intend to continue testing the StealthRay antenna in the United States in preparation for deployment. Again, the Army anticipates a major reduction in troop vulnerability by deploying units equipped with the StealthRay antenna.
- RAS is working with the Pennsylvania National Guard and the University of Pittsburgh Medical Center to test the StealthRay antenna to provide satellite-based, two-way broadband communications services in support of disaster recovery, emergency response and related missions.

The StealthRay antenna is also used to support additional operations of U.S. government, military and other customers.

Grant of the requested experimental STA is essential to maintaining these critical military and homeland security operations. Accordingly, the public interest would be strongly served by affording expedited treatment to RAS's STA application and ensuring a timely grant prior to expiration of the existing experimental authority on August 1, 2007.

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

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To the extent the Commission requires any additional information to act favorably on this application, RAS will provide such information. In addition, David Gross, CEO of RAS, would be pleased to meet with the Commission staff to provide additional information regarding the critical missions that RAS is currently supporting.

Please feel free to contact me with any questions regarding this matter.

Respectfully submitted,

/s/ Carlos M. Nalda

Carlos M. Nalda

Counsel for Raysat Antenna Systems, LLC

cc: Julius Knapp
Ira Keltz
Behnam Ghaffari