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September 1, 2010

Jose Trevino
OET Experimental Licensing Branch
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Mr. Trevino:

On behalf of WCA Holdings III, LLC ("WCA"), an applicant for experimental STA (File No. 0398-EX-ST-2010, Call Sign WE9XMO), we hereby update the record of this proceeding to reflect additional commitments to protect NASA TDRSS stations from potential interference.

WCA agrees to the following conditions to ensure that its single Ku-band aircraft earth station ("AES") terminal installed on a WCA-owned aircraft: (i) WCA will not operate the AES terminal while on the ground within 125 km of the two TDRSS earth stations at Whites Sands, New Mexico (32.5430N, 106.6121W and 32.5008N, 106.6086W) or the TDRSS Guam site (13.5881N, 144.8410E); and (ii) WCA will not operate the AES terminal while airborne within radio line-of-sight ("RLOS") distance of the above sites, as calculated in accordance with the following formulas: RLOS (km) = 1.609 x (Sq Root (2x aircraft altitude (h) in feet)) + 15, and RLOS (miles) = Sq Root (2 x h) + 9.[1]

We would also note that WCA's operating partner, Panasonic Avionics Corporation, is in the process of developing a detailed coordination agreement with NASA to protect existing and future TDRSS operations from potential interference from Ku-band AES operations.

Sincerely,
Squire, Sanders & Dempsey L.L.P.

s/ Carlos M. Nalda
Carlos M. Nalda

[1] Example calculations of TDRSS protection distances (in km) for airborne terminal operations:
(1) Altitude of 10, 000 feet, RLOS (in km) = 1.609 x Sq Root (2 x 10,000) + 15 = 243 km.
(2) Altitude of 30,000 feet, RLOS (in km) = 1.609 x Sq Root (2 x 30,000) + 15 = 409 km.