



International Bureau

Federal Communications Commission
Washington, DC 20554

October 1, 2004

Jeffrey Olson, Esquire
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1615 L Street, NW
Washington, DC 20036

Re: Orbital Debris Mitigation: SkyBridge L.L.C., Application for Authority to Launch and operate the SkyBridge Satellite System – File Nos. SAT-LOA-19970228-00021; SAT-AMD-19970703-00058; SAT-AMD-19980630-00056; SAT-AMD-19990108-00004; SAT-AMD-20020917-00167; SAT-AMD-20040719-00135; Call Sign S2241.

Dear Mr. Olson:

This letter requests additional information, pursuant to Section 25.111(a) of the Commission's Rules, regarding the orbital debris mitigation plan of the SkyBridge satellite system. SkyBridge has provided the Commission with information concerning a number of measures that it will employ in order to mitigate orbital debris, however, SkyBridge did not specifically address the issue of potential collisions with large objects.¹ Therefore, we request that SkyBridge provide the following information:

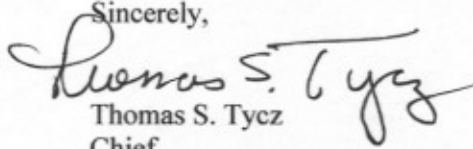
- 1) A statement as to whether SkyBridge has assessed and limited the probability of its satellites becoming a source of debris by collision with large debris or other functioning satellites;
- 2) Please indicate whether there are any other NGSO constellations, currently in orbit or planned, with similar orbital characteristics (i.e. apogee, perigee, inclination, or RAAN) such that the volumes in which the satellites will orbit substantially overlap. If there are, please provide an analysis of the potential risk of in-orbit collision and a description of any measures SkyBridge plans to take to avoid such collision;
- 3) Please specify the tolerance, during the operational life of the satellite, to which the following orbital parameters will be maintained:
 - a. Apogee
 - b. Perigee
 - c. Inclination
 - d. RAAN
 - e. Satellite phasing, for orbits with more than one satellite.

¹ Amendment to application, SAT-AMD-20020917-00167, Exhibit C to Form 312, "Orbital Debris Mitigation."

We also note that the SkyBridge amendment states that "SkyBridge will ... maintain stationkeeping to within 0.1°".² It is unclear as to what parameter this statement refers. We request that SkyBridge clarify this statement concerning its orbital configuration.

In order for us to continue processing the SkyBridge space station application, we require that the above information be provided by October 15, 2004. If you have any questions you may either contact Sankar Persaud at (202) 418-2441 or by e-mail at Sankar.Persaud@fcc.gov or Karl Kensinger at (202) 418-2441 or by e-mail at Karl.Kensinger@fcc.gov.

Sincerely,



Thomas S. Tycz
Chief
Satellite Division

² Amendment to application, SAT-AMD-20020917-00167, Exhibit C to Form 312, "Orbital Debris Mitigation," page 8.