



Federal Communications Commission  
Washington, DC 20554

International Bureau

January 21, 2004

**In Reply Refer To:**

File No. SAT-MOD-20031118-00333  
SAT-AMD-20031118-00332  
SES-MOD-20031118-01877

Bruce D. Jacobs  
David S. Konczal  
Tony Lin  
Shaw Pittman LLP  
2300 N Street, NW  
Washington, D.C. 20037-1128

**Re: Mobile Satellite Ventures Subsidiary LLC**

Application for Minor Modification of Space Station License (AMSC-1)  
Application for Minor Amendment of Pending Application to Launch and  
Operate a Next-Generation Replacement MSS Satellite System  
Application for Minor Modification of Blanket Authorization to Operate Mobile  
Earth Terminals with MSAT-1

Dear Messrs. Jacobs, Konczal, and Lin:

We need the following additional information in order to assess MSV's request for waivers of provisions in Paragraphs (a)(2), (c), (d)(1), (d)(2), (d)(3), (d)(4), (d)(5), and (e) of Section 25.253 of the Commission's rules.

1. An analysis of the potential interference from MSV ATC base stations to airborne AMS(R)S terminals from both a statistical basis and a worst case basis using proposed antenna and EIRP values (see Table 2.2.3.1.A in Appendix C2 of the ATC Order)<sup>1</sup>, with a description of all assumptions that are used.
2. An analysis of the coordination distance that should apply to SARSAT receive terminals operating in the 1525-1559 MHz band, including a description of all assumptions and propagation models that are used. Results should be presented in a manner similar to Table 3.3B in Appendix C2 of the ATC Order.
3. A link budget from the ATC handset to the satellite for the -4.0 dBW EIRP terminal and average power reduction due to vocoder 1/2 -rate operation for both the current satellite and the next generation satellite.

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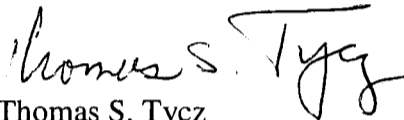
<sup>1</sup> *Flexibility for Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band, the L-Band, and the 1.6/2.4 GHz Bands* (Report and Order and Notice of Proposed Rulemaking), FCC 03-15, 18 FCC Rcd 1962 (2003), reconsidered, FCC 03-162, 18 FCC Rcd 13590 (2003)..

4. An analysis of the potential for AMS(R)S airborne terminal overload similar to that contained in Table 2.2.3.2.A in Appendix C2 of the ATC Order using the proposed values of EIRP and antenna gain changes.

5. In evaluating your waiver request for section 25.253(a)(2), we reviewed the relevant GSM specifications, and it appears that the specified burst duration is the same for both the full-rate and half-rate vocoders. It would appear based on this information that the additional 0.5 dB reduction in average power would not apply to this situation. Please clarify how you intend to achieve this reduction in average power, assuming you intend to maintain the same transmitter power and GSM burst duration. In addition, your analysis only addresses a TDMA system. Provide a similar analysis showing how the vocoder factor would be applied to a CDMA system.

Please provide this information before COB February 4, 2003, with hand-delivered or electronic courtesy copies to William Bell, William.Bell@fcc.gov, and Kathryn Medley, Kathryn.Medley@fcc.gov. If you fail to provide the information within this time period the captioned applications may be dismissed pursuant to Sections 25.112(c) and 25.152(b) of the Commission's rules.

Sincerely,



Thomas S. Tycz  
Chief, Satellite Division  
International Bureau

cc: Lon C. Levin  
Vice President  
Mobile Satellite Ventures Subsidiary LLC  
10802 Parkridge Boulevard  
Reston, VA 20191