



International Bureau

Federal Communications Commission
Washington, DC 20554

January 26, 2005

Ms. Jennifer Warren
Senior Director, Trade & Regulatory Affairs
Lockheed Martin Corporation
1725 Jefferson Davis Highway
Arlington, VA 22202-412

Re: Lockheed Martin Corp., Application for Authority to Launch and Operate Geostationary Orbit Satellites in the Radionavigation Satellite Service at the 133° W.L. (File Nos. SAT-LOA-19990427-00047, SAT-AMD-20030730-00151, SAT-AMD-20040130-00009, SAT-AMD-20040203-00011, SAT-AMD-20040706-00129, Call Sign: S2372), 107.3° W.L. (File Nos. SAT-LOA-19990427-00046, SAT-AMD-20030730-00150, SAT-AMD-20040130-00008, SAT-AMD-20040205-00012, SAT-AMD-20040524-00106, Call Sign: S2371), 79° W.L. (File Nos. SAT-LOA-19990427-00045, SAT-AMD-20030730-00149, SAT-AMD-20040721-00142, Call Sign: S2370), 71° E.L. (File Nos. SAT-LOA-19990427-00049, SAT-AMD-20030730-00152, SAT-AMD-20040721-00143, Call Sign: S2374), and 131.8° E.L. orbital locations (File Nos. SAT-LOA-19990427-00050, SAT-AMD-20030730-00153, SAT-AMD-20040721-00144, Call Sign: S2375).

Dear Ms. Warren:

Lockheed Martin Corporation ("Lockheed") has filed the above-captioned applications to launch and operate satellites at the 133° W.L., 107.3° W.L., 79° W.L., 71° E.L. and 131.8° E.L. orbital locations, as part of its Regional Positioning System ("RPS"), a radio-navigation satellite service ("RNSS") network.

In its applications and subsequent amendments, Lockheed requested authority to utilize frequencies in the L-band and C-band spectrum for its proposed radio-navigation satellite service. In a Public Notice the Satellite Division released in June 2004¹, we provided clarification of Section 25.140(b)(2) of our rules, concerning the Space Station Application Interference Analysis requirement. In the Public Notice, we provided guidance on the

¹ See *Public Notice*, International Bureau Satellite Division Information: Clarification of 47 C.F.R. § 25.140(b)(2), Space Station Application Interference Analysis, No. SPB-195, 18 FCC Rcd 25099 (2003) as clarified by International Bureau Satellite Division Information: Clarification of 47 C.F.R. 25.140(b)(2), Space Station Interference Analysis, *Public Notice*, SPB-207, DA 04-1708 (rel. June 16, 2004) ("*June 16th Public Notice*").

submission of the two-degree interference analysis. We also expressly stated that the rule would be applied to “[a]ny geostationary satellite orbit space station applications for operation in any FSS frequency band.”² Since Lockheed requests FSS spectrum for its feeder uplinks and TT&C functions, we find that these requests render this rule applicable to Lockheed’s RPS applications.³ However, Lockheed did not include such an interference analysis in its applications and subsequent amendments. We make note that we stated in the Public Notice that “Applications filed prior to this Public Notice that do not meet these requirements may be subject to a Commission letter requesting that the applicant provide supplemental information on the interference analysis.” Therefore, since this Public Notice was released subsequent to Lockheed’s filings, we request that Lockheed amend its existing applications and provide a two-degree spacing interference analysis for each of its five proposed orbital locations by February 10, 2005. If Lockheed fails to file the requested information by February 10, 2005, Lockheed’s applications, may be dismissed pursuant to sections 25.112(c) and 25.152(b) of the Commission’s rules.

Additionally, we remind Lockheed of the Commission’s recent decision to amend the Part 25 satellite rules to adopt new rules concerning mitigation of orbital debris.⁴ These rules require applicants for space stations to submit a description of design and operational strategies it will use to mitigate orbital debris, including a statement assessing the risk of collusion with co-located satellites, and detailing post-mission disposal plans. We note that since these rules will become effective in the near future, Lockheed may wish to consider providing this information in connection with its amendments.

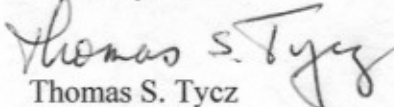
² See June 16th Public Notice at 2.

³ Specifically, Lockheed requests FSS spectrum for the feeder uplinks and TT&C functions for its proposed satellite at the 79° W.L., 131.8° E.L. and 79° E.L. orbital locations. See Lockheed Martin 1999 RNSS applications at pp. 33-34, as amended. Lockheed requests FSS spectrum for only the feeder uplinks for its proposed satellite at 107.3° W.L. and 133° W.L. See also Lockheed Martin RPS-133 February 2004 amendment at Table 1.1-1, Requested Frequency Bands for the 133° W.L. Orbital Location, subsequently amended by July 2004 application. See also Lockheed Martin RPS-107.3 February 2004 amendment at Table 1.1-1, Requested Frequency Bands for the 107.3° W.L. Orbital Location.

⁴ Mitigation of Orbital Debris, *Second Report and Order*, IB Docket Number 02-54, FCC 04-130 (rel. June 21, 2004)

For further information or clarification regarding this letter please contact Jabin Vahora of my staff at 202-418-1229. Also, please provide a courtesy copy to Jabin Vahora of all responses to this letter.

Sincerely,


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