

6017 Woodley Road
McLean, VA 22101
May 12, 2005

RECEIVED

MAY 12 2005

BY HAND DELIVERY:

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Federal Communications Commission
Office of Secretary

Received

MAY 16 2005

Policy Branch
International Bureau

**Re: Application of contactMEO Communications, LLC,
File Nos. SAT-AMD-200040322-00057,
Callsign S2346**

Dear Ms. Dortch:

contactMEO Communications, LLC (“@contact”), by its attorney, hereby responds to the letter of April 27, 2005 (“April 27 Letter”) from the Chief of the Engineering Branch of the Satellite Division of the Commission’s International Bureau (“Bureau”). In its April 27 Letter, the Bureau notes that the orbital parameters of @contact’s proposed system are identical to the orbital parameters provided by Northrop Grumman Space & Mission System Corporation (“NGST”) in its NGSO FSS Ka-band system application. The Bureau, concerned about the possibility of in-orbit collisions between the HEO satellites of the two systems, requests a written explanation of the measures @contact intends to take to avoid such collisions. It further asks for information regarding the steps that have been taken toward coordination between the two systems, as well as the likelihood of successful coordination of physical operations.

@contact intends to rely on coordination between the NGST and @contact systems to assure that in-orbit collisions will not occur. The two parties had a number of technical discussions prior to March 2004 regarding the use of HEO satellites with essentially identical orbital parameters. It was these discussions that led to the orbital parameters contained in the pending amended applications of both @contact and NGST. These parameters were chosen to maximize use of the available spectrum and allow both systems to operate on a full-time basis.

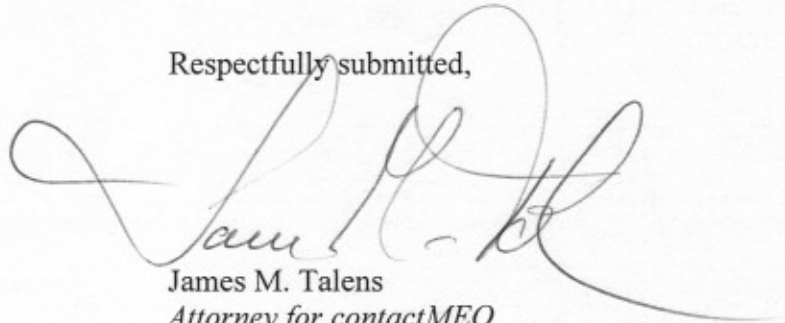
Of course, @contact fully expects to continue to engage in coordination discussions with NGST to ensure that the two systems’ operations are physically compatible. However, it should be noted that the nature of the system designs should assure that there is no potential for in-orbit collisions between any @contact and NGST HEO satellites.¹ In any event, @contact and NGST will coordinate their systems’ orbital parameters as necessary to ensure that the satellites of the second of the systems to launch will be spaced sufficiently from the satellites of the first-launched system to avoid in-orbit collisions.

¹ Details regarding technical data are contained in NGST’s response to a letter similar to the Bureau’s April 27 Letter. To the extent necessary, these data are incorporated by reference.

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@contact trusts that the foregoing satisfies the Bureau's requests in its April 27 Letter. If there are any questions or if any further information is needed, please do not hesitate to contact the undersigned.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "James M. Talens". The signature is written in dark ink and is positioned above the printed name and title.

James M. Talens
*Attorney for contactMEO
Communications, LLC*

cc: Robert Nelson, IB
Kal Krautkramer, IB