

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

FILED/ACCEPTED

NOV 16 2006

Federal Communications Commission  
Office of the Secretary

In re the Application of

ATCONTACT COMMUNICATIONS, LLC

For a Modification of License to Specify the  
87° W.L. Orbital Location Instead of 83° W.L.  
in the Ka-band Fixed-Satellite Service

Received

NOV 21 2006

Policy Branch  
International Bureau

File No. SAT-AMD-20060905-00098

Call Sign S2680

To: The Commission

**RESPONSE**

Northrop Grumman Space & Mission Systems Corporation (“NGST”) submitted supportive Comments in response to the application of ATCONTACT COMMUNICATIONS, LLC (“@contact”) to relocate its GSO satellite from 83° W.L. to 87° W.L., retaining the 2 x 500 MHz in the 18.8-19.3 GHz and 28.6-29.1 GHz bands (“NGSO bands”) already authorized and adding 2 x 1000 MHz of Ka-band fixed-satellite service spectrum allocated on a primary basis to the Fixed Satellite Service (“FSS”). By this Response @contact wishes to concur with the observations offered by NGST with respect to more efficient use of the Ka-band, as well as to observe that NGST supports @contact with regard to the subject application.

At the outset and throughout its Comments, NGST emphasizes that it does not oppose @contact’s application in any way.<sup>1</sup> Its purpose in offering its Comments rests largely in its interest in using this proceeding as a means to offer suggestions on how the Ka-band, for which it is a pending applicant and @contact is a current licensee, might be more efficiently utilized.

<sup>1</sup> NGST Comments at 1, 2, 3.

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In particular, it believes that using Earth terminals for use with GSO satellites in the 18.8-19.3 GHz and 28.6-29.1 GHz bands smaller than 70 cm is possible were the spacing between the GSO satellites increased to about four degrees. It notes that both it and @contact have complied fully with the two-degree spacing requirements applied to GSO-like satellites in the NGSO bands.<sup>2</sup>

NGST states that two-degree spacing is sound policy in bands where the GSO FSS is primary. However, it suggests, in the 18.8-19.3 GHz and 28.6-29.1 GHz bands where NGSO networks require protection from satellites using the NGSO bands at GSO locations there is a need for increased spacing between satellites to protect the primary NGSO systems. More significantly, NGST adds, increased spacing to four degrees could facilitate the introduction of additional systems when needed for special purposes<sup>3</sup> as well as smaller Earth terminals. Indeed, NGST states that has been planning to address this approach by amending its own application for a GSO space station using the NGSO bands at 119° W.L. to specify an orbital location that is four or more degrees away from @contact's licensed slot at 121° W.L. Similarly, it is reevaluating its proposed location at 89° W.L.<sup>4</sup>

For its part, @contact views the opportunities suggested by NGST as creative and positive, both for the industry and for future potential services in the NGSO portion of the Ka-band. @contact will discuss orbital relocation issues with NGST outside the environs of the

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<sup>2</sup> *Id.* at 4. noting Public Notice, *Classification of 47 C.F.R. § 25.140(b)(2) Space Station Application Interference Analysis*, Report No. SPB-207 (rel. June 16, 2004). See also contactMEO Communications, LLC, DA 0864, slip op. at 15 (¶ 37) (rel. April 14, 2006) (Commission ruling for the first time that it would apply the two-degree spacing requirement to GSO-like proposed satellites in the NGSO bands).

<sup>3</sup> *Id.* at 3.

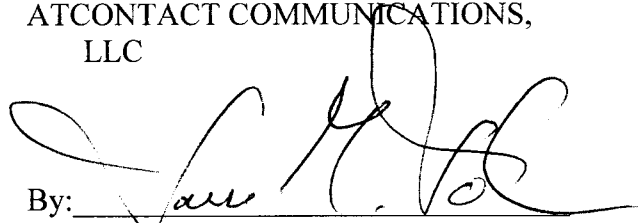
<sup>4</sup> *Id.* at 5.

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application process. Meanwhile, @contact urges the Commission to move swiftly to grant its application, which in turn will further development of the opportunities NGST has urged in its Comments. It will also remove uncertainties as @contact moves toward satisfying its milestones.

Respectfully submitted,

ATCONTACT COMMUNICATIONS,  
LLC

By:   
James M. Talens

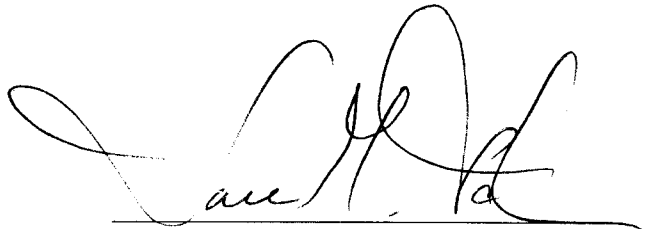
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November 16, 2006

**CERTIFICATE OF SERVICE**

I, James M. Talens, do hereby certify that on this 16<sup>th</sup> day of November, 2006, I sent by U.S. first-class, postage prepaid mail, a copy of the foregoing to the following:

Stephen D. Baruch  
Leventhal Senter & Lerman PLLC  
2000 K Street, N.W.  
Suite 600  
Washington, DC 20006

A handwritten signature in black ink, appearing to read 'James M. Talens', written over a horizontal line.

James M. Talens