Federal Communications Commission
Washington, DC 20554

International Bureau

September 15, 2008

James M. Talens, Esq.
Counsel for ATCONTACT COMMUNICATIONS, LLC
6017 Woodley Road
McLean, VA 22101

Re: ATCONTACT COMMUNICATIONS, LLC
Files Nos. SAT-MOD-20070924-00130, SAT-AMD-20071215-00176; SAT-AMD-20080505-00100, SAT-AMD-20080505-00096 (Call Sign S2680); and SAT-MOD-20070924-00132, SAT-AMD-20080505-00099 (Call Sign S2682).

Dear Mr. Talens:

This letter requests additional information concerning the above referenced applications filed by ATCONTACT COMMUNICATIONS, LLC (ATCONTACT). In the applications, ATCONTACT seeks to make various technical changes to its licensed geostationary satellite orbit (GSO) space stations. In each application, ATCONTACT requests a waiver of Section 25.114(d)(3) of the Commission's rules, which requires each space station applicant to provide "predicted space station antenna gain contours for each transmit and receive beam requested."[1] In its applications, ATCONTACT states that each satellite will utilize 45 active receive and 45 active transmit beams, for a total of up to 180 beams. ATCONTACT included a total of four representative uplink and downlink beams in Schedule S of its application, maintaining that it would burdensome to include all of the beams with its application. ATCONTACT also states that it would provide additional gain contour files for other spot beams upon Commission request.[2]

We find that the four representative beams do not provide sufficient information to allow us to determine whether ATCONTACT's modified space stations will operate in conformance with the Commission's rules and will not cause interference to other systems. In light of ATCONTACT's claim that including the contour information for each beam is burdensome, ATCONTACT may, in lieu of providing the information as set forth in the rules, either:

1. Provide a text file with a table listing all 180 transmit/receive beams (labeled by city and state), the boresight latitude, the boresight longitude, the EIRP at boresight, and the associated antenna beamwidth (major and minor axis for each beam, as well as the orientation of the major axis, as required to generate the beams in GIMS). Within

[1] 47 C.F.R. § 25.114(d)(3).

[2] ATCONTACT COMMUNICATIONS, LLC, File Nos. SAT-MOD-20070924-00130, Technical Appendix, at 22-23; SAT-AMD-20071215-00176, Technical Appendix, at 24-25; SAT-AMD-20080505-00100, Technical Appendix, at 26; SAT-AMD-20080505-00096, Technical Appendix, at 22; SAT-MOD-20070924-00132, Technical Appendix, at 25; and SAT-AMD-20080505-00099, Technical Appendix, at 25.

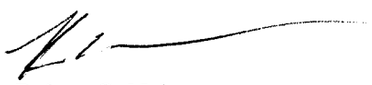
the same text file, ATCONTACT must include a second table containing the half cone angle (in degrees) for each contour level (-2, -4, -6, -8, -10, -15, and -20 dB) for the representative co-polarized contours of the spot beams.

2. Provide a text file with a table listing all 180 transmit/receive beams (labeled by city and state), the boresight latitude and the boresight longitude, along with the predicted space station antenna gain contours for each transmit and receive beam (a total of 180 beams) in .pdf format showing the contour levels (-2, -4, -6, -8, -10, -15, and -20 dB) of the spot beams.

We also note that the link budget information for the 7M00G7W, 700KG2W, 1M00FXD, 125MG7W, and 600KG7D emission designators in the Technical Appendix of the above-referenced applications has not been provided in Schedule S, Sections S11 and S12. Please provide all of the information required in these sections of the Schedule S forms.

Accordingly, ATCONTACT COMMUNICATIONS, LLC must amend its Schedule S forms to include the requested information. ATCONTACT COMMUNICATIONS, LLC must file its response in the form of amendments to each of the underlying modification applications within 15 days of the date of this letter, with a courtesy copy to Kal Krautkramer of my staff. Failure to respond by this date may result in dismissal of the applications. Please contact Kal Krautkramer at (202) 418-1335 if you have any questions.

Sincerely,



Robert G. Nelson
Chief, Satellite Division
International Bureau

cc: Mr. David M. Drucker
Manager, ATCONTACT COMMUNICATIONS, LLC