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April 22, 2009

FILED/ACCEPTED

APR 23 2009

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Letter of February 6, 2009 by AtContact Communications, LLC, Concerning File Nos. SAT-MOD-20080813-00155 (S2346); SAT-AMD-20080930-00195 (S2680); SAT-AMD-20080505-00098 (S2381); SAT-AMD-20080930-00194 (S2682); SAT-MOD-20060511-00057 (S2683).

Dear Ms. Dortch:

On February 6, 2009, AtContact Communications, LLC (“AtContact”) submitted a letter in response (“Response”) to the International Bureau’s (“Bureau” or “IB”) correspondence of January 9, 2009 regarding File Nos. SAT-MOD-20060511-00056 and SAT-MOD-20080813-0155 in the matter of AtContact’s compliance with its milestone requirement to commence physical construction of its first non-geostationary satellite orbit (“NGSO”) satellite.¹ The Response outlined why AtContact’s demonstration of compliance with its October 15, 2008 milestone should be accepted and the extant bond reduced by \$1 million.

The Response also presented a stark assessment of today’s satellite market in view of the current economic situation and offered adjustments to AtContact’s future plans. Included was surrender of two AtContact GSO slots and the AtContact NGSO authorization, as well as a request for regulatory flexibility and Commission assistance in support of

* Admitted to practice in the District of Columbia only.

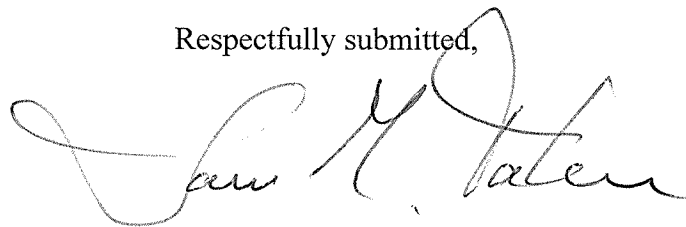
¹ Letter to Marlene H. Dortch, Secretary, Federal Communications Commission, from James M. Talens, Counsel for AtContact Communications, LLC (October 15, 2008) (demonstrating compliance with milestone for commencement of construction of first NGSO satellite). *See also* Letter to Marlene H. Dortch, Secretary, Federal Communications Commission From James M. Talens, Counsel for AtContact (February 6, 2009) (seeking relief as summarized herein). On February 4, 2009, David M. Drucker, Manager, William A. Vanderpoel, CFO, and James M. Talens, Counsel, met with Bureau staff and management to explain the contents of its forthcoming February 6 Response.

AtContact's two remaining GSO slots at 87° W.L. and 121° W.L., assuming of course that the Commission grants AtContact's pending license modification applications to relocate its 83° W.L. satellite to 87° W.L. and to add GSO-band spectrum to that authorization. AtContact also requested an extension of 36 months in the remaining GSO milestone dates to accommodate the impact of the financial market and the Economic Stimulus Plan. This extension is justified (1) because of the current world financial market situation, (2) because there is no detriment to others seeking to use the spectrum, (3) because warehousing is patently not AtContact's objective, and (4) because no other licensee would proceed any more quickly than AtContact to bring Ka-band satellite services to a reality. Finally, AtContact provided public interest substantiation under the rules and case precedents for waiver of its remaining system bond

AtContact met with International Bureau staff and management on March 25 to reiterate the matters presented in the February 6 Response and summarized herein. We stated both in the February 6 Response and at the meeting that AtContact would be establishing cooperation agreements with WildBlue Communications, Inc. and EchoStar, Inc. in furtherance of satellite construction and launch. Attached hereto is a statement from David Drucker, Manager, AtContact, offering the latest developments in furtherance of these matters.

It is now time for the Commission to play its part by granting the relief and assistance AtContact and the United States need to launch and operate GSO FSS Ka-band satellites at 87° W.L. and 121° W.L.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James M. Talens". The signature is fluid and cursive, with a large loop at the end.

James M. Talens
Counsel to AtContact
Communications, LLC

Attachment



APRIL 16, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: AtContact Communications, LLC, Concerning File Nos. SAT-MOD-20080813-00155 (S2346); SAT-AMD-20080930-00195 (S2680); SAT-AMD-20080505-00098 (S2381); SAT-AMD-20080930-00194 (S2682); SAT-MOD-20060511-00057 (S2683).

Dear Ms. Dortch:

I met with the International Bureau and the Eighth Floor on two recent occasions to convey to the Bureau the earnestness of AtContact's struggle over the past years to get advanced financing in these difficult times.

This is beyond the significant internally generated funds and personal contributions from our existing Alaska-centric IP Connectivity business, to continue the construction of a Ka band system for the provision of broadband coverage throughout rural America.

On October 15, 2008 we formally advised the International Bureau that we had expended substantial sums and incurred obligations to meet our construction milestone in purchasing the long lead items necessary to commence construction of our first Ka satellite.

We met again with International Bureau staff and management on March 25 to update them on our progress.

AtContact had stated both in its February 6, 2009 Response and at the meeting that it would be establishing cooperation agreements with WildBlue Communications, Inc. and EchoStar, Inc. in furtherance of satellite construction and launch. We also discussed the return of its authorization by NGC as the only other FCC licensed Ka NGSO system

I am gratified to report that agreements have now been finalized with both companies.

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We have a very focused outlook on utilizing the Ka orbital location at 87W to supplement the existing service to the United States from 111.1 especially in those regions where there is limited capacity from the currently operating Ka satellite. We also are pursuing the construction of a Ka band payload at 121W for a specialized backbone for rural broadband especially to Alaska.

None of this can be possible, nor can we continue our current business, without the affirmative decisions by the FCC to allow for the meeting of its most recent Milestone, for grant of its modifications including the grant of its Ka GSO authority at 87 W.

The Milestone action by the FCC will allow collateral to be released that will be reinvested in our business allowing for the continued fostering of ubiquitous rural broadband growth by AtContact in the United States.

Yours Very Truly

A handwritten signature in black ink, appearing to read 'David M Drucker'.

David M Drucker
AtContact Communications LLC

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