



Federal Communications Commission  
Washington, D.C. 20554

March 27, 2002

VIA FACSIMILE AND U.S. MAIL

Peter A. Rohrbach, Esq.  
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Columbia Square  
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Washington, D.C. 20004-1109

Re: Astrolink International LLC, Files Nos. 182 through  
186 SAT-P/LA-95 & SAT-MOD-19971222-00200.

Dear Mr. Rohrbach:

On January 28, 2002, the Satellite Division requested certain information concerning the milestone obligations set forth in the Ka-band license granted to Astrolink International, LLC ("Astrolink"). Specifically, we requested a copy of an executed contract verifying that construction has commenced on the first satellite and that the satellite will be built within the time frame specified in the license.

On February 8, 2002, Astrolink submitted a copy of an executed contract with Lockheed Martin Corporation for the purchase of four satellites, a satellite control facility, and related services and data. According to the cover letter, this contract was terminated on October 13, 2001. In the cover letter to the submission, you suggest that Astrolink retains title to the satellite work in progress despite the termination of the contract and state that Astrolink is positioned to complete and launch the satellite in keeping with its authorization milestones.

The Commission has consistently required licensees to show that they have met the construction commencement milestone by executing a non-contingent contract verifying that construction has commenced and the satellite will be built within the time frame specified in the license. This requirement is intended to ensure that licensed entities are proceeding with construction of their satellites and will launch their satellites in the time frame specified in the license and so are not warehousing orbital location and frequency assignments. We do not have enough information on which to make a finding that Astrolink is in compliance with the construction commencement milestone. Astrolink has not submitted an effective non-contingent contract that demonstrates it will be able to complete construction of and launch the satellite by the required milestone.<sup>1</sup>

Please provide us with additional information to meet this concern. This information must be filed with the Commission's Secretary by April 3, 2002 with a hand delivered or electronic courtesy copy to Alyssa Roberts (aroberts@fcc.gov) of my staff. Failure to provide this information shall render

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<sup>1</sup> See NetSat 28 Company, LLC, *Memorandum Opinion and Order*, 15 FCC Rcd 11321 (Int'l Bur. 2000) and 16 FCC Rcd 11025 (Int'l Bur. 2001).