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McLean, VA 22101
May 29, 2008

Robert Nelson, Chief
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

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Federal Communications Commission
Bureau / Office

Re: File Nos. SAT-LOA-19971222-00222, SAT-MOD-20060511-00056, Callsign S2346.

Dear Mr. Nelson:

In Order and Authorization, DA 06-864, the International Bureau issued ContactMEO Communications, LLC (now AtContact Communications, LLC, "AC") authority for a satellite system consisting of three non-geostationary satellite orbit (NGSO) satellites and four geostationary satellite orbit satellites to provide fixed-satellite service (FS) in the Ka-band. At paragraph 63 of that Order, and as detailed at paragraph 47, there is a condition that requires submission, prior to May 30, 2008, of an application to modify the authorization for the NGSO FSS satellites specifying end-of-life operations.

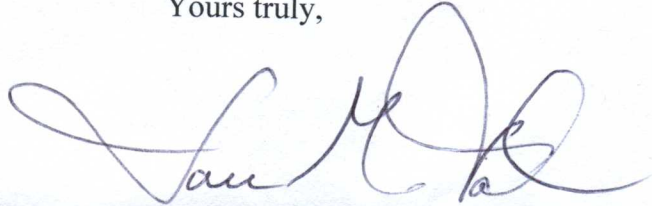
AC filed its Complete Critical Design Review in April of this year. However, even in that technical document the matter of end-of-life operation could not be detailed as outlined in paragraph 47 of the Order. The reason is that there are a number of technical and procedural changes that are in the process of development for the NGSO component, each of which will directly or indirectly affect the fashion by which end-of-life operations will be implemented. Those, in turn, affect the insurability, procedures and coordination operations of the NGSO component. In short, final details regarding end-of-life operations cannot into place until late in the implementation process. Put simply, it is not technically feasible at this time to submit the details required for a modification application as sought at paragraphs 47 and 63 of the AC license.

Normally, a date-specific would be requested by which time the required filing would be submitted. However, consultations with the contractor, Space Systems/ Loral, indicate that it may be some months before the information is available in a final form suitable for submission to the Commission. Thus, while AC now requests an extension of time of six months in which to file this information, it may be necessary to seek a further extension later. Alternatively, if the information becomes available prior to that date, AC will file the requested modification immediately.

Preparing an appropriately accurate technical demonstration for end-of-life operations for AC's NGSO FSS satellites assures that the public interest and relevant safety features of

AC's satellite system will unfold as planned. Given that this is the first case the Commission has addressed to dispose of satellites using controlled atmospheric reentry at end of life, it is reasonable that flexibility be permitted, especially in view of the complex coordination requirements associated with the process. Indeed, there is no inherent public detriment to grant of this extension request given the system has not yet been constructed. Accordingly, AC requests an extension of time of six months in which to submit its end-of-life operations modification application.

Yours truly,

A handwritten signature in blue ink, appearing to read "James M. Talens", written in a cursive style.

James M. Talens
Counsel for AtContact
Communications, LLC

cc: Fern Jarmulnek, IB via email
Kal Krautkramer, IB via email
Arnold Friedman, SSL via email
Michael Gooding, SSL via email