

ORIGINAL

LEVENTHAL SENTER & LERMAN PLLC

January 19, 2007

VIA HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20054

FILED/ACCEPTED
JAN 19 2007
Federal Communications Commission
Office of the Secretary

Re: Virtual Geosatellite, LLC, Call Sign S2366

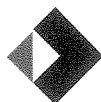
Dear Ms. Dortch:

Virtual Geosatellite, LLC (“Virtual Geo”), by its attorneys and pursuant to Paragraph 80 of the Order and Authorization in *Virtual Geosatellite, LLC*, DA 06-2560, slip op. at 25 (Int’l. Bur., released, December 21, 2006) (“*Virtual Geo Order*”), hereby submits the attached certification regarding compliance of Virtual Geo’s “Virgo” system with the aggregate EPFD_{down} limits that protect Ku-band geostationary orbit Ku-band fixed-satellite service (“FSS”) and broadcasting-satellite service (“BSS”) networks from co-frequency non-geostationary orbit FSS systems.

The Commission determined in the *Virtual Geo Order* that Virtual Geo had demonstrated that it meets the single-entry validation EPFD limits. See *Virtual Geo Order*, DA 06-250, slip op. at 9 (¶ 28). Virtual Geo confirms that the assumptions that went into its submission remain unchanged. Moreover, because Virtual Geo is the sole entity with a license or authorization for a Ku-band non-GSO FSS system that will serve the United States, there are presently no other Ku-band non-GSO FSS systems that could combine with Virgo to result in an exceedance of the aggregate EPFD_{down} limits in Sections 25.208(h) and (m) of the Commission’s Rules, 47 C.F.R. §§ 25.208(h) and (m). Accordingly, an operational Virgo system using the parameters applied for and authorized to Virtual Geo in the *Virtual Geo Order* would not exceed the aggregate EPFD_{down} limits.

Virtual Geo is mindful of its obligations regarding continued compliance with all of the single-entry and aggregate EPFD limits in the Commission’s Rules, and will supplement the showings it made in its application for license and the certification it makes here, as needed, to ensure that these limits continue to be satisfied even if additional systems emerge.

SAT-LOA-19990108-00007
SAT-AMD-20020916-00173
SAT-AMD-20041222-00227
SAT-AMD-20051118-00242



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Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

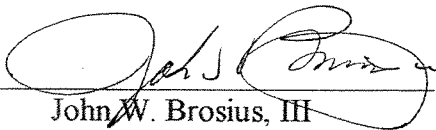
Raul R. Rodriguez
Stephen D. Baruch
Attorneys for Virtual Geosatellite, LLC.

cc (by e-mail): Robert Nelson
Andrea Kelly
Cassandra Thomas
Mark Young
Steven Spaeth
Karl Kensinger

TECHNICAL CERTIFICATION

I, John W. Brosius, III, hereby certify, under penalty of perjury, that I am familiar with Part 25 of the Commission's Rules, and that the information contained in the foregoing letter regarding the present and future technical compliance of Virtual Geosatellite, LLC's "Virgo" system with the aggregate EPFD_{down} limits contained in Sections 25.208(h) and (m) of the Commission's Rules, 47 C.F.R. §§ 25.208(h) and (m), is true and correct to the best of my knowledge and belief.

January 18, 2007

By: 
John W. Brosius, III
Virtual Geosatellite, LLC