



Federal Communications Commission  
Washington, D.C. 20554

October 30, 2013

John P. Janka  
Latham & Watkins LLP  
555 Eleventh Street, NW  
Suite 1000  
Washington, D.C. 20004

Re: Inmarsat Hawaii Inc.  
SAT-LOI-20130319-00035  
Call Sign: S2897

Dear Mr. Janka:

This letter requests additional information concerning the above-referenced application filed by Inmarsat Hawaii Inc. Inmarsat seeks access to the United States market via its proposed Inmarsat-KA 63W space station. Inmarsat states the space station will operate under the authority of the United Kingdom at the 62.85° W.L. orbital location in the 18.3-19.3 GHz (space-to-Earth), 19.7-20.2 GHz (space-to-Earth), 28.1-29.1 GHz (Earth-to-space), and 29.5-30.0 GHz (Earth-to-space) frequency bands (Ka-band).

In its application, Inmarsat does not provide an interference analysis with respect to the Amazonas-3 space station or make any reference to this space station. Amazonas-3 was launched in February 2013 and is operating at the 61° W.L. orbital location under the authority of Brazil.<sup>1</sup> Amazonas-3 is operating in several frequency bands, including the Ka-band frequencies for which Inmarsat requests U.S. market access. Because Inmarsat intends to operate Inmarsat-KA 63W at an orbital location less than two degrees away from Amazonas-3, we request, pursuant to Section 25.111(a) of the Commission's rules, Inmarsat to amend its market access request to include an interference analysis with respect to Amazonas-3.<sup>2</sup>

In addition, we note that Inmarsat has requested a waiver to use Ka-band non-geostationary orbit (NGSO) Fixed-Satellite Service (FSS) frequencies for its geostationary orbit FSS space station system.<sup>3</sup> To support its request for this waiver, Inmarsat should demonstrate how it will protect O3b Limited's Ka-

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<sup>1</sup> Amazonas-3 was granted market access to the United States in several frequency bands, including the 18.3-18.8 GHz and 19.7-20.2 GHz (space-to-Earth), and the 28.1-28.6 GHz and 29.5-30.0 GHz (Earth-to-space) portions of the Ka-band. Consistent with the Ka-band Plan, uplink operations from the United States in the 28.10-28.35 GHz frequency band are permitted on a secondary basis and are limited to gateway earth station operations. See Hispamar Satellites, S.A., IBFS File No. SAT-MPL-20130319-00049, adding Amazonas-3 to the Commission's Ka-band Permitted Space Station List (granted Aug. 1, 2013). See also IBFS File No. SAT-PPL-20121018-00183, adding Amazonas-3 to the Commission's C- and Ku-band Permitted Space Station List (granted Mar. 14, 2012).

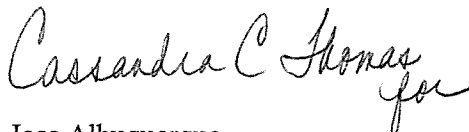
<sup>2</sup> See Amendment of the Commission's Space Station Licensing Rules and Policies, *First Report and Order and Further Notice of Proposed Rulemaking*, IB Docket No. 02-34, 18 FCC Rcd 10760, 10870, ¶ 296 (2003).

<sup>3</sup> The 28.6-29.1 GHz (Earth-to-space) and 18.8-19.3 GHz (space-to-Earth) frequency bands are designated to NGSO FSS on a primary basis.

band NGSO FSS system from interference, by providing a technical analysis, with supporting calculations, demonstrating its compatibility with O3b Limited's earth stations.<sup>4</sup>

Please submit the requested information by November 29, 2013. Failure to do so may result in the dismissal of Inmarsat's pending application pursuant to Section 25.112(c) of the Commission's rules, 47 C.F.R. § 25.112(c).

Sincerely,

A handwritten signature in cursive script that reads "Cassandra C. Thomas" followed by a stylized flourish.

Jose Albuquerque  
Chief, Satellite Division  
International Bureau

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<sup>4</sup> See O3b Limited, IBFS File No. SES-LIC-20130124-00089 (Call Sign E130021, Vernon, Texas), granted June 20, 2013; IBFS File No. SES-LIC-20100723-00952 (Call Sign E100088, Haleiwa, Hawaii), granted Sept. 25, 2012.