

Federal Communications Commission Washington, D.C. 20554

April 21, 2008

James M. Talens, Esq. Counsel for ATCONTACT Communications, Inc. 6017 Woodley Road McLean, VA 22101

Re: ATCONTACT Communications LLC

SAT-MOD-20080226-00052

(Call Sign: S2681)

Dear Mr. Talens:

This letter refers to the above-referenced application filed by ATCONTACT Communications, LLC (ATCONTACT). In the application, ATCONTACT proposes to relocate its authorized satellite from its current location at 121° W.L. to the 115.2° W.L. orbital location.

Section 25.140(b) of the Commission's rules requires ATCONTACT to demonstrate that its proposed operations at the 115.2° W.L. orbital location are compatible with the Commission's two-degree spacing environment. Specifically, Section 25.140(b)(2) requires applicants to submit an interference analysis demonstrating that the proposed satellite is compatible with authorized or proposed satellites. In instances where there are no authorized or proposed satellites, the applicant may use the technical data of its own satellite. Because there are no authorized or proposed satellites within 2 degrees of ATCONTACT's proposed satellite, ATCONTACT uses the technical parameters of its own satellite in its analysis and assumes the adjacent satellite is operating at the 117° W.L. orbital location.

To assist the Commission in processing this application, ATCONTACT should amend its application to include the following information:

- Explain why the calculations in Table 12 are based on ATCONTACT's proposed satellite operating at 115° W.L. instead of the requested 115.2° W.L. orbital location:
- 2) Explain why the space station transmit EIRP density in Tables 11 and 12 are different;

¹ 47 C.F.R. § 25.140(b)(2). *See also* Public Notice, International Bureau, Satellite Division Information: Clarification of 47 C.F.R. § 25.140(b)(2), Space Station Application Interference Analysis, 19 FCC Rcd 10652 (Int'l Bur. 2004) (*Clarification Public Notice*).

² Clarification Public Notice.

- Explain why the earth station receive system noise temperature in Tables 11 and 12 are different;
- 4) Explain why the uplink earth station transmit EIRP density in Tables 11 and 12 are different;
- 5) After making corrections to Tables 11 and 12, state whether the I_o, I_o/N_o, and uplink/downlink degradation values, when recalculated in Table 12, still offer the positive link margin needed to prove successful operation can occur in a two degree environment.

In amending this application, please take the appropriate steps to assure that the application is accurate and complete.

ATCONTACT's response must be filed with the Commission's Secretary within 15 days of the date of this letter, with a courtesy copy to Kal Krautkramer of my staff. Failure to respond by this date will result in dismissal of this application. Please contact Kal at (202) 418-1335 if you have any questions.

Sincerely,

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Robert G. Nelson Chief, Satellite Division International Bureau

cc: Mr. David M. Drucker

Manager, ATCONTACT Communications, LLC