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March 14, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th Street, S.W.
Washington, D.C. 20554

Re: File No. SAT-PDR-20020823-00161

Dear Ms. Dortch:

On behalf of Spacecom Satellite Communications Services S.C.C. Ltd., enclosed please find an original and four copies of a Supplement to Petition for Declaratory Ruling to add the AMOS-2 satellite at 4° W.L. to the Commission's Permitted Space Station List, File No. SAT-PDR-20020823-00161. Also enclosed is an additional copy, which we ask you to date stamp and return with our messenger.

Please do not hesitate to contact the undersigned with any questions you may have regarding this petition.

Sincerely,

Benjamin J. Griffin
Christopher R. Bjornson

Counsel for Spacecom Satellite
Communications Services S.C.C. Ltd.

Enclosures

cc: Jay Whaley

WDC 328635v1

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Spacecom Satellite Communications	)	
Services S.C.C. Ltd.	)	File No. SAT-PDR-20020823-00161
	)	RECEIVED
Petition for Declaratory Ruling to Add	)	
Spacecom Satellite Communications	)	MAR 1 4 2003
Services Ltd. AMOS-2 Satellite	)	
At 4° W.L. to the Commission's	)	Federal Communications Commission
Permitted Space Station List	)	Office of Secretary

To: International Bureau

SUPPLEMENT TO PETITION FOR DECLARATORY RULING

Spacecom Satellite Communications Services S.C.C. Ltd. ("Spacecom"), by counsel and pursuant to Section 25.137 of the Commission's rules and the *DISCO II First Reconsideration Order*,[1/] hereby respectfully requests that the Commission add the AMOS-2 satellite at 4° W.L. to the Commission's Permitted Space Station List, for the provision of services to and from the United States covered by the World Trade Organization's Basic Telecommunications Agreement ("WTO Basic Telecom Agreement") and supplements it Petition for Declaratory Ruling filed on August 23, 2002, File No. SAT-PDR-20020823-00161.

Spacecom files this supplement to clarify that it seeks permission for the AMOS-2 satellite to receive transmissions from U.S. uplink earth stations in the 14.0-14.5 GHz

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1/ Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States, IB Docket No. 96-111, *First Order on Reconsideration*, FCC 99-325, 15 FCC Rcd 7207 (rel. Oct. 29, 1999) ("*DISCO II First Reconsideration Order*").

band and transmit to U.S. receive earth stations in the 11.45-11.7 band ("Ku-band").[2/] To the extent U.S.-licensed earth stations have an "ALSAT" designation and communicate with AMOS-2 in the conventional Ku-band frequencies, such earth stations would be permitted to communicate with AMOS-2 without further authorization once AMOS-2 is placed on the Permitted Space Station List. Although AMOS-2 also will operate in the "extended" Ku-band frequencies (13.75-14.0 GHz and 11.45-11.7 GHz), Spacecom understands that any U.S. earth station wishing to transmit in the extended Ku-band uplink frequencies would need to modify its license on a case-by-case basis in order to obtain authorization to do so. In addition, any proposed downlinks in the extended Ku-band would be for international services only, and only as permitted by the Commission's Rules.

Attached to this supplement are gain contour plots and antenna radiation patterns illustrating the technical aspects of the satellite operations of AMOS-2.

As documented herein and in its previous filing, AMOS-2 satisfies all legal and technical requirements for U.S. service. Furthermore, access by all U.S. earth stations with an ALSAT designation to AMOS-2 would produce substantial public interest benefits. As stated previously, AMOS-2 will enhance Spacecom's transatlantic offerings by providing U.S. earth station operators with a greater range of space station service choices and more capacity. The expansion of capacity available to the U.S. market will stimulate lower prices, improve service quality, increase service options and foster technological innovation.

2/ Spacecom does not seek authority to provide Direct-to-Home service, Direct Broadcasting Service or Digital Audio Radio service in the United States.

Therefore, for the reasons set out above, Spacecom respectfully requests that the Commission issue a declaratory ruling adding the AMOS-2 satellite to the Permitted Space Station List.

Respectfully Submitted,

Spacecom Satellite Communications Services S.C.C. Ltd.

Benjamin J. Griffin
Christopher R. Bjornson
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(202) 434-7300

March 14, 2003

WDC 327069v1

AMOS-2

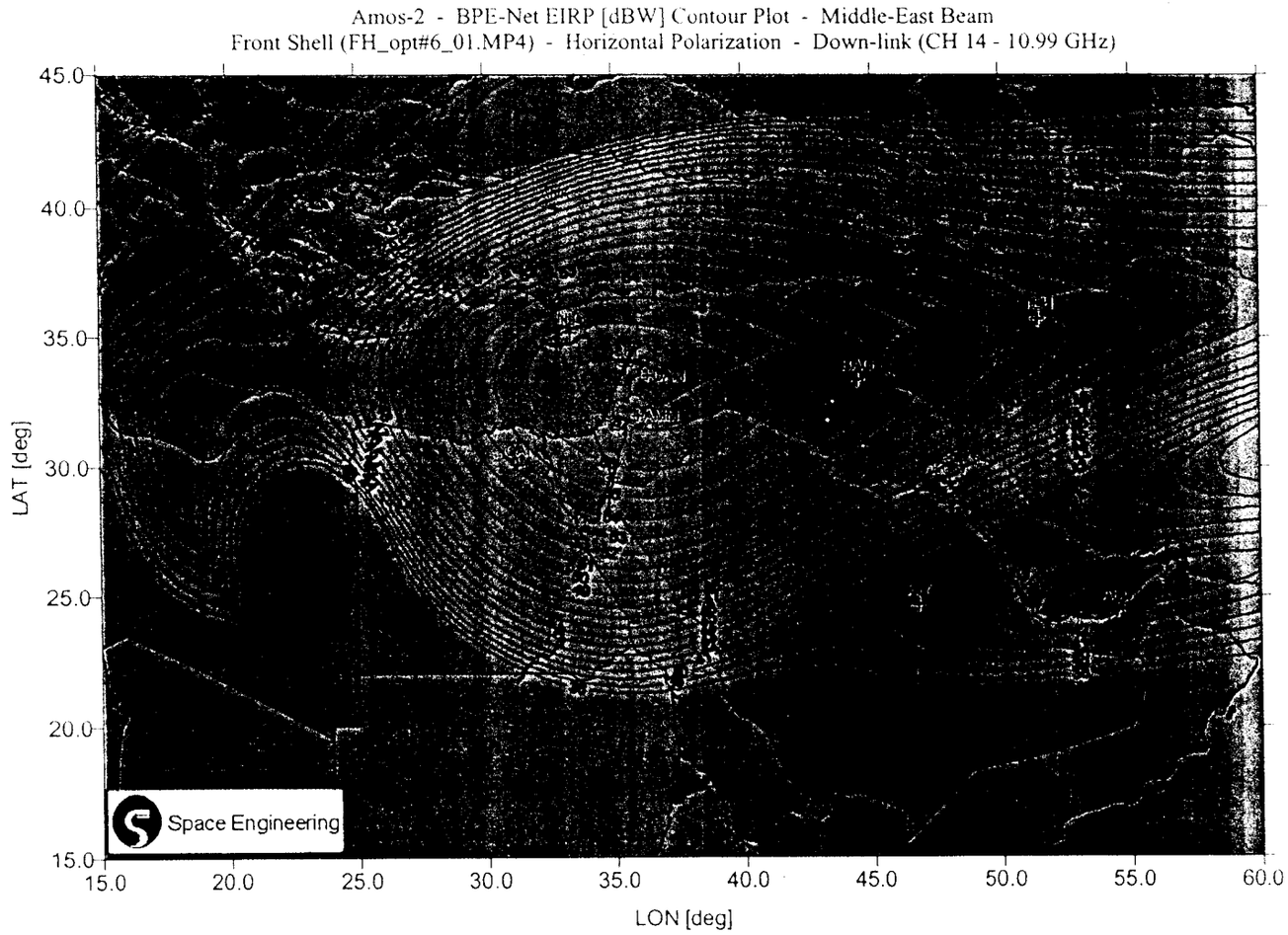
SYSTEM DESIGN REVIEW (SDR)

Antenna radiation Patterns

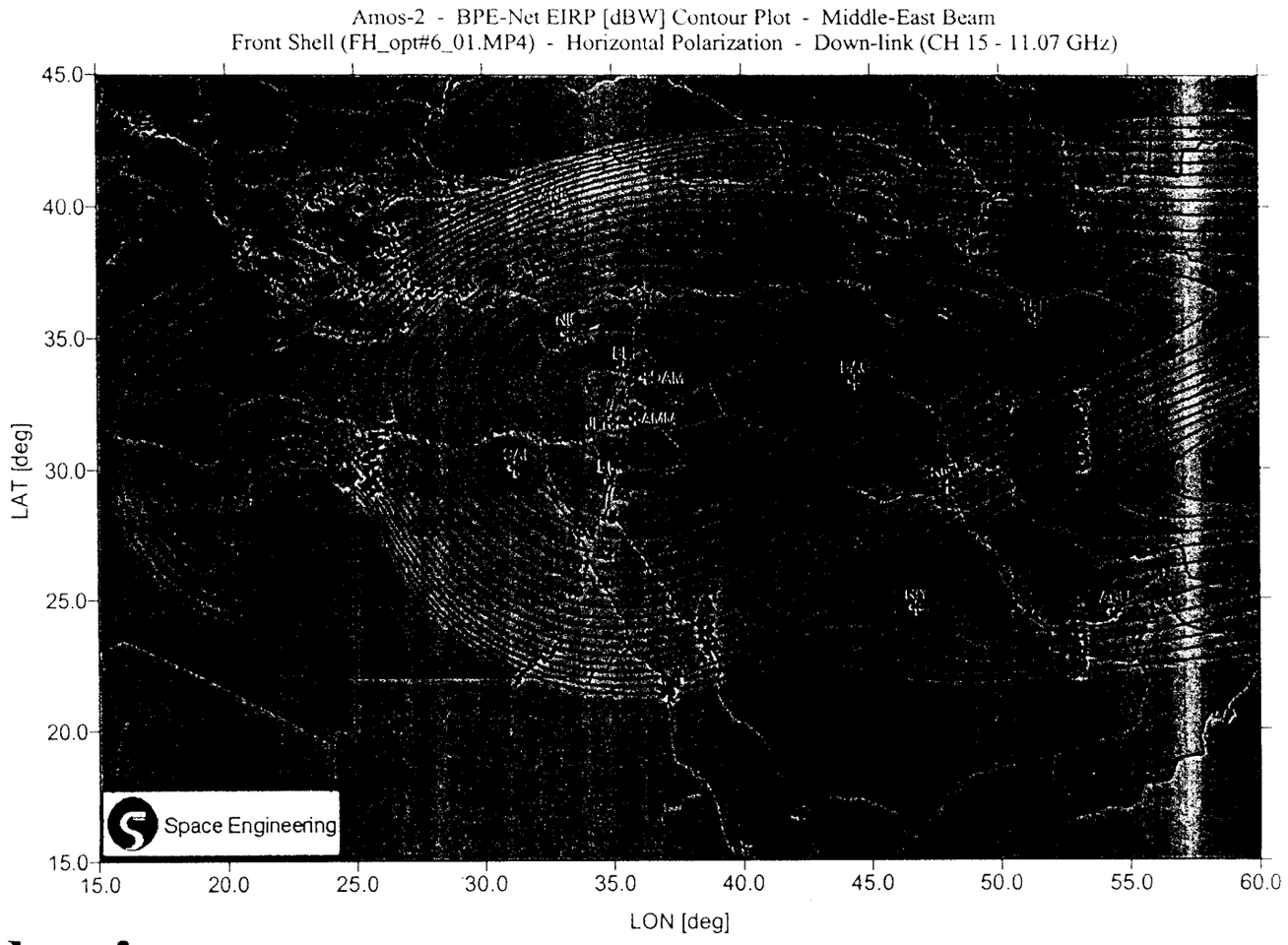
DGA EIRP & G/T contour plots

- In the following figures the contour plots concerning antenna Gain performances, converted to EIRP and G/T by means of the above specified payload I/F parameters, are reported.
- The plots are reported in an Earth reference system (latitude/longitude), where the meridians and parallels are straight lines, parallel to the coordinate axes.
- Values of EIRP or G/T reported on these plots are net figures, processed as to give, on each geographical point, the minimum of the performance, considering the 0.17° BPE.

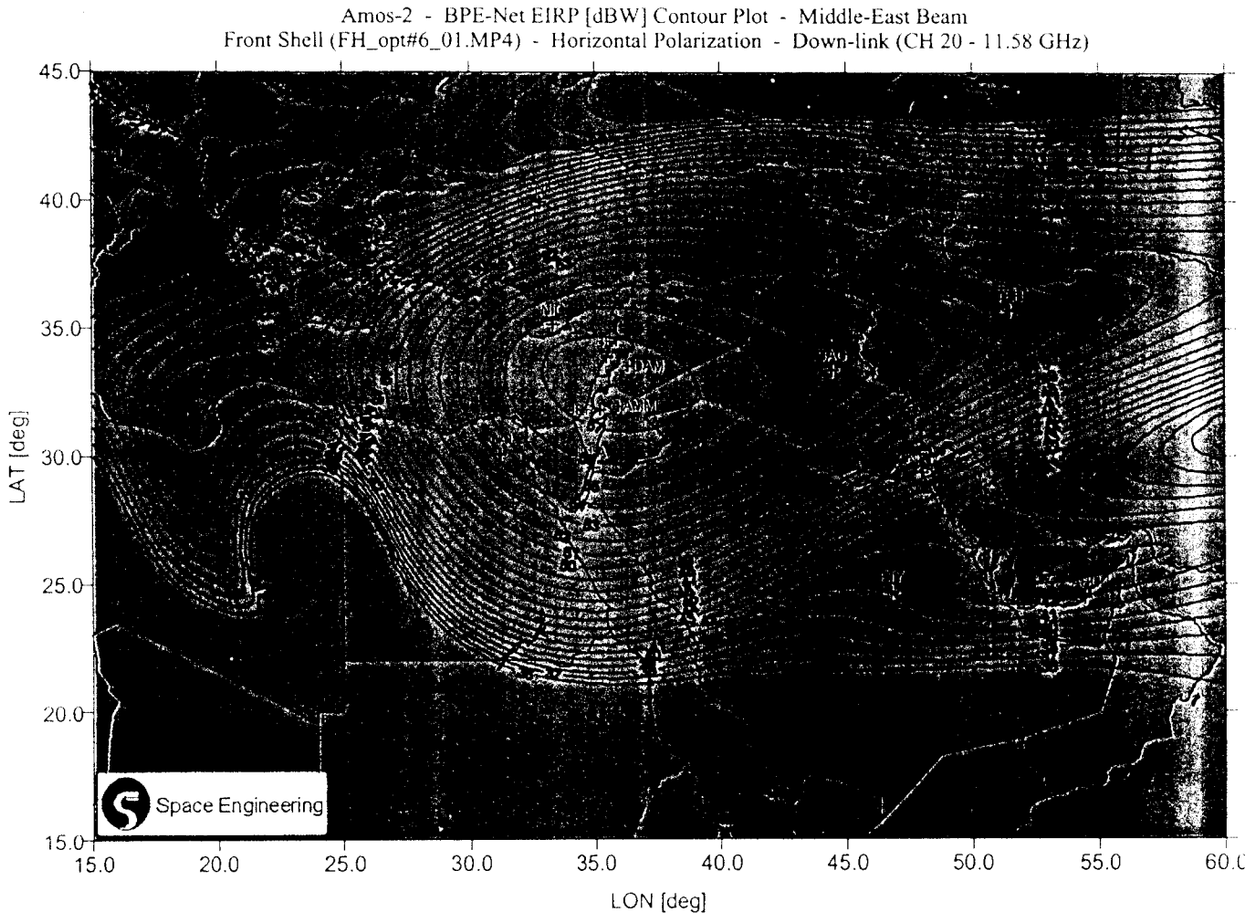
DGA EIRP contour plots: ME H beam



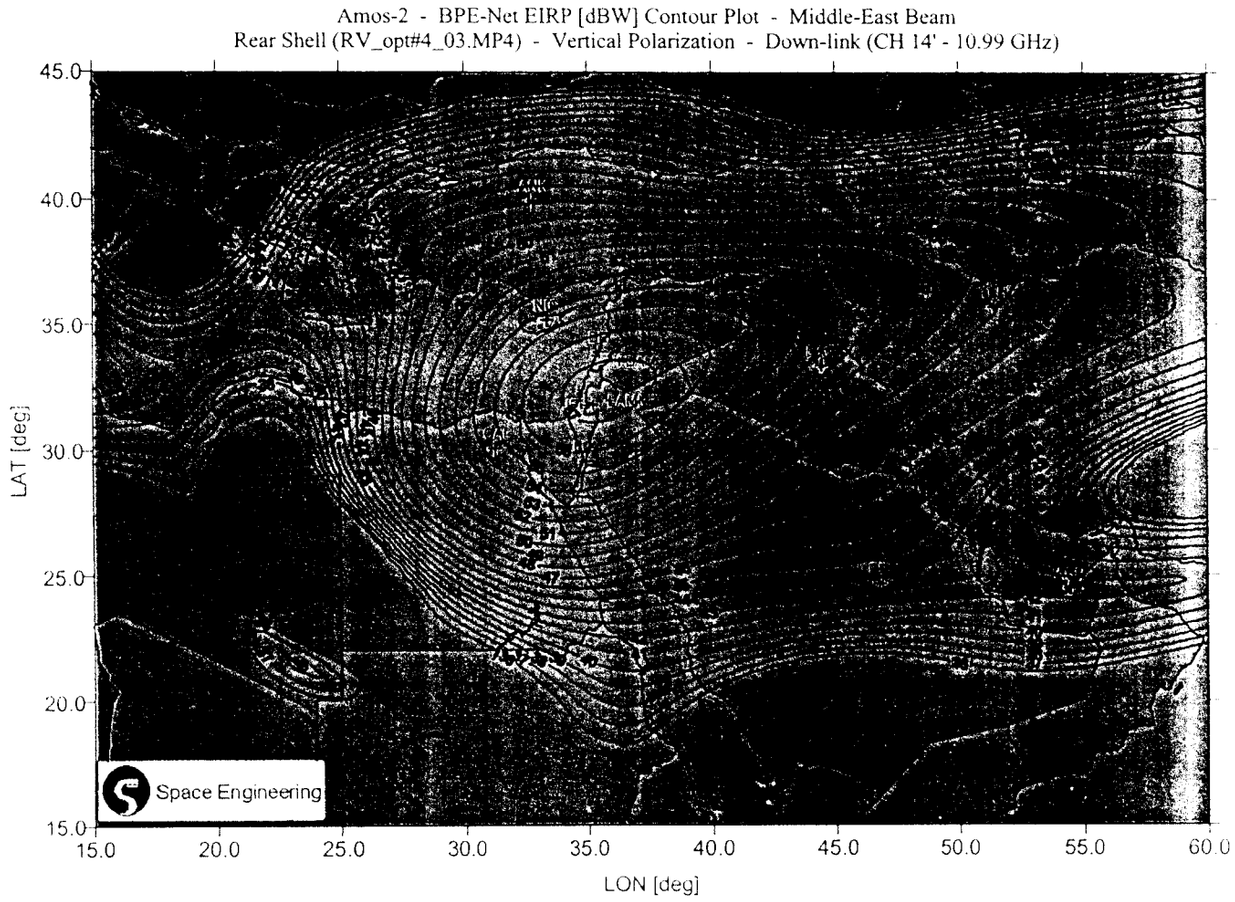
DGA EIRP contour plots: ME H beam, cont'd



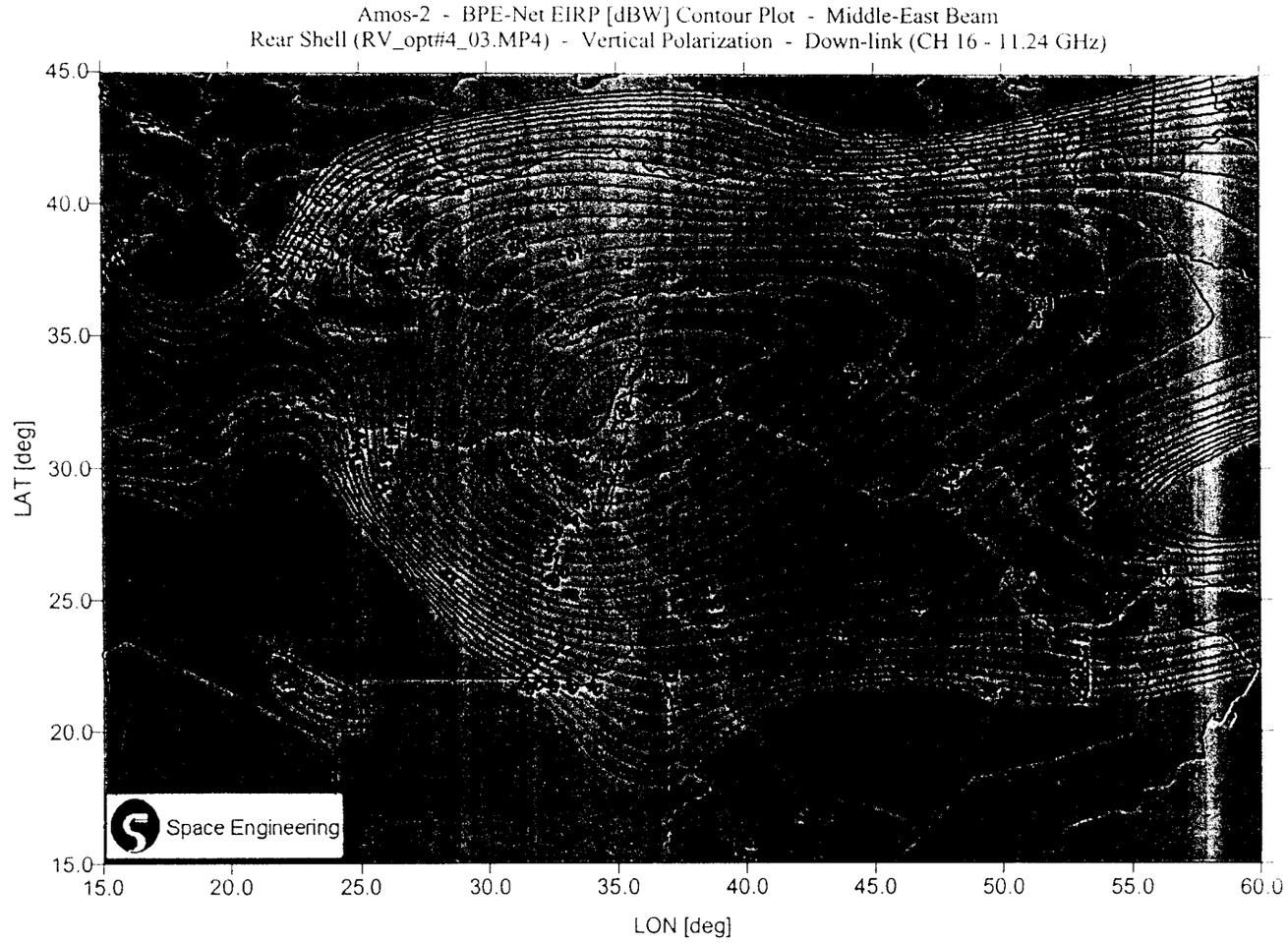
DGA EIRP contour plots: ME H beam, cont'd



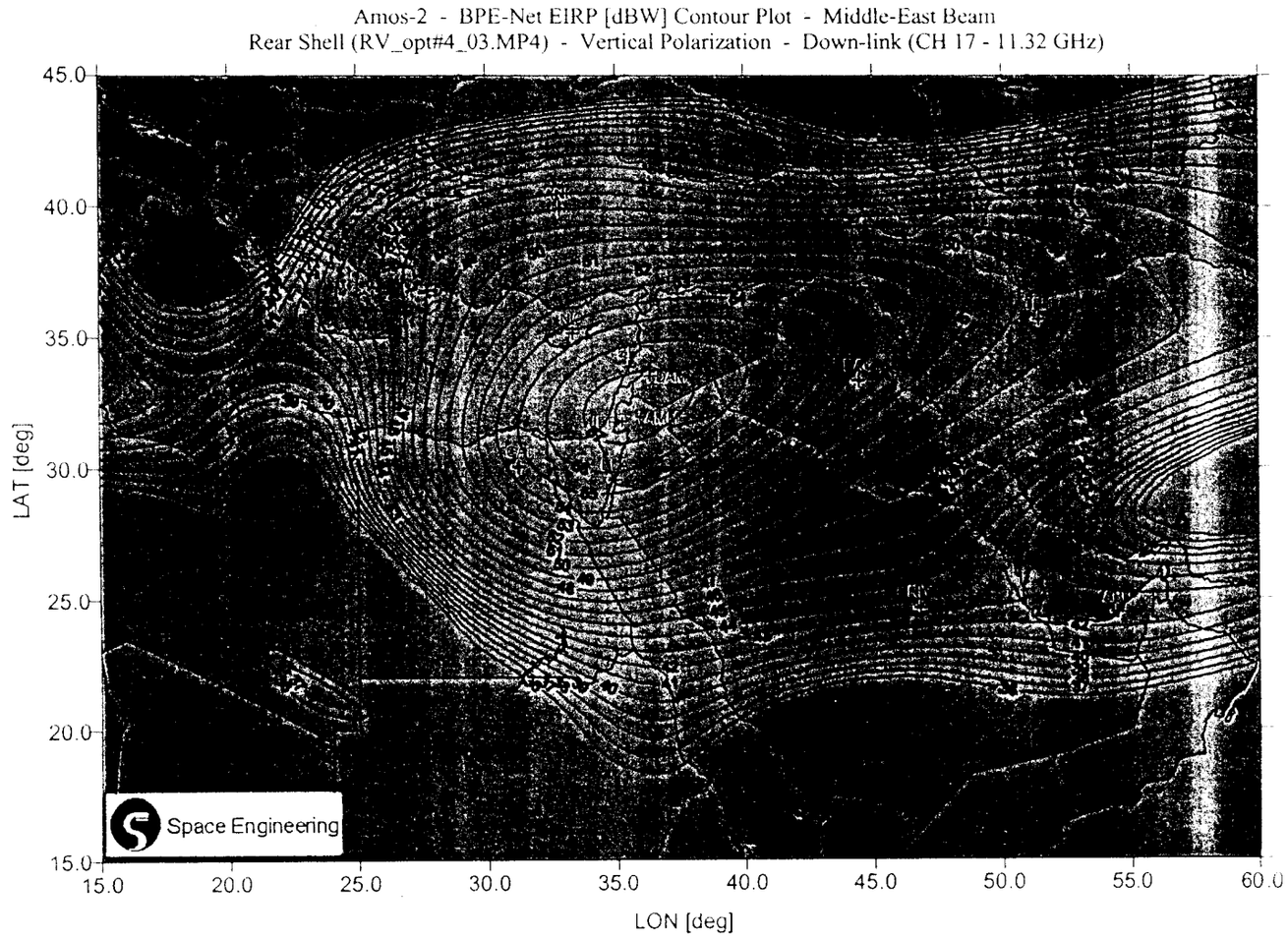
DGA EIRP contour plots: ME V beam



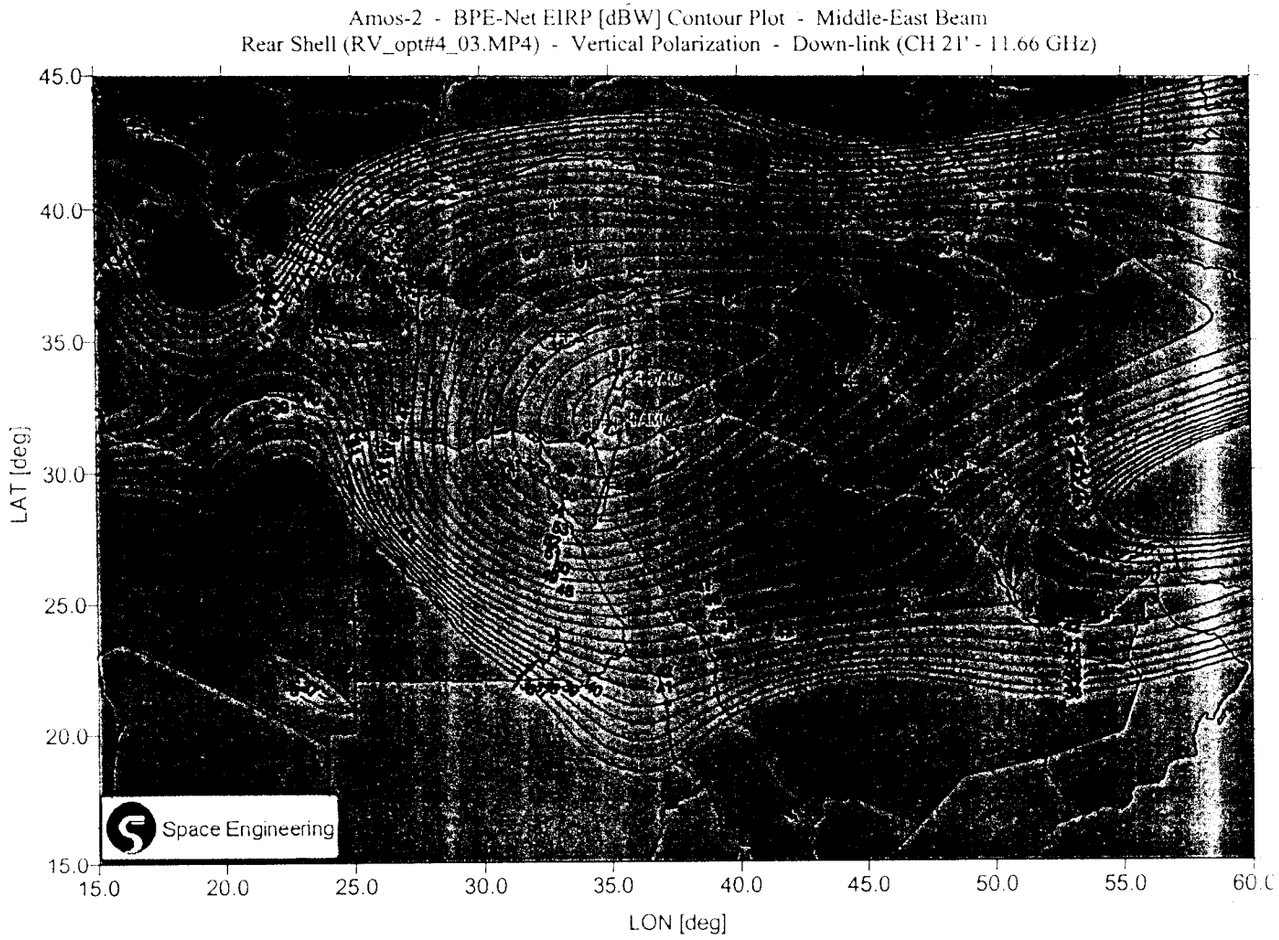
DGA EIRP contour plots: ME V beam, cont'd



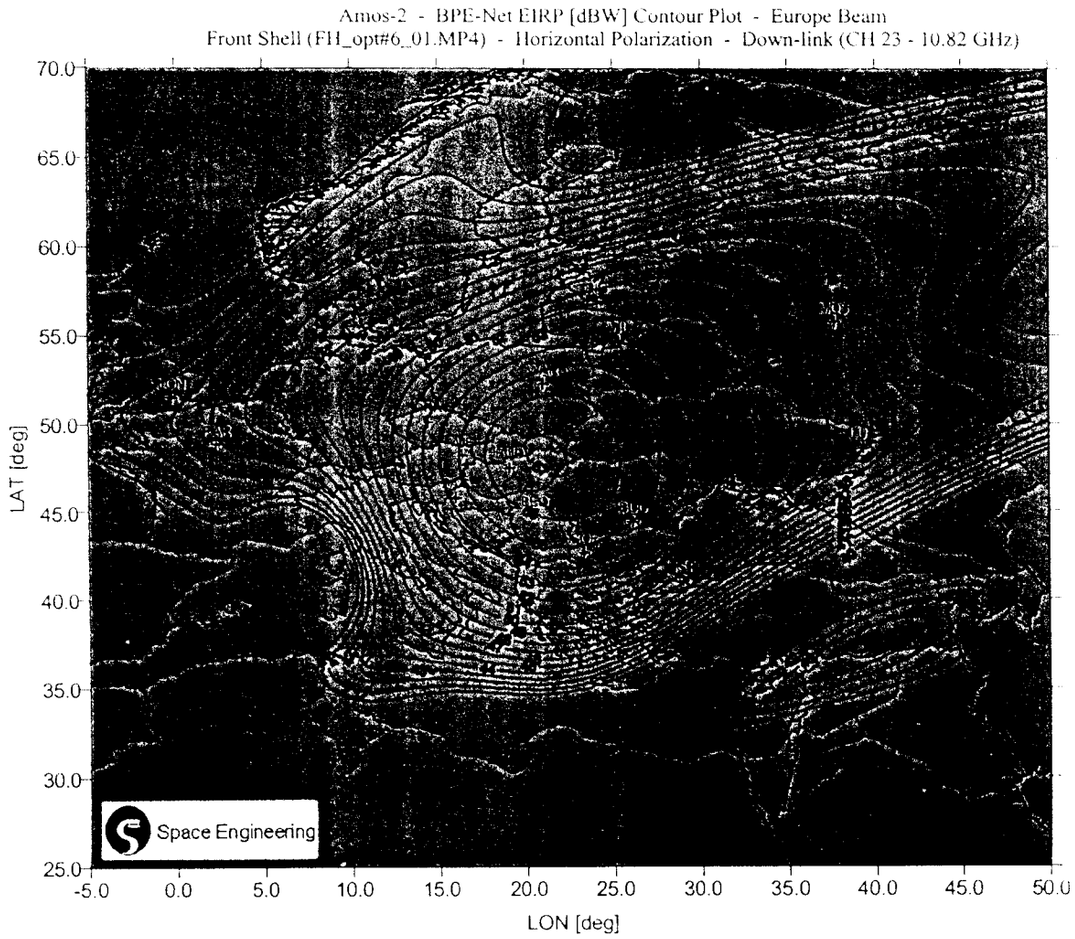
DGA EIRP contour plots: ME V beam, cont'd



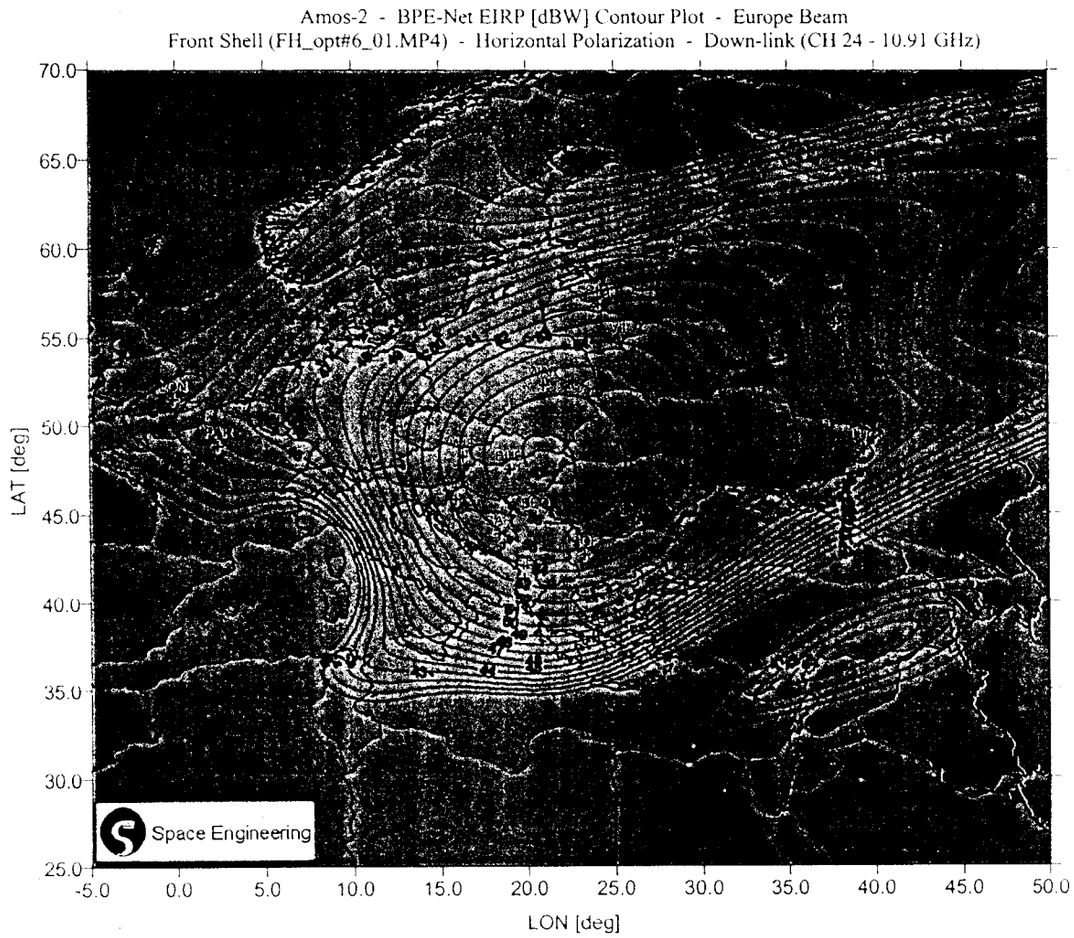
DGA EIRP contour plots: ME V beam, cont'd



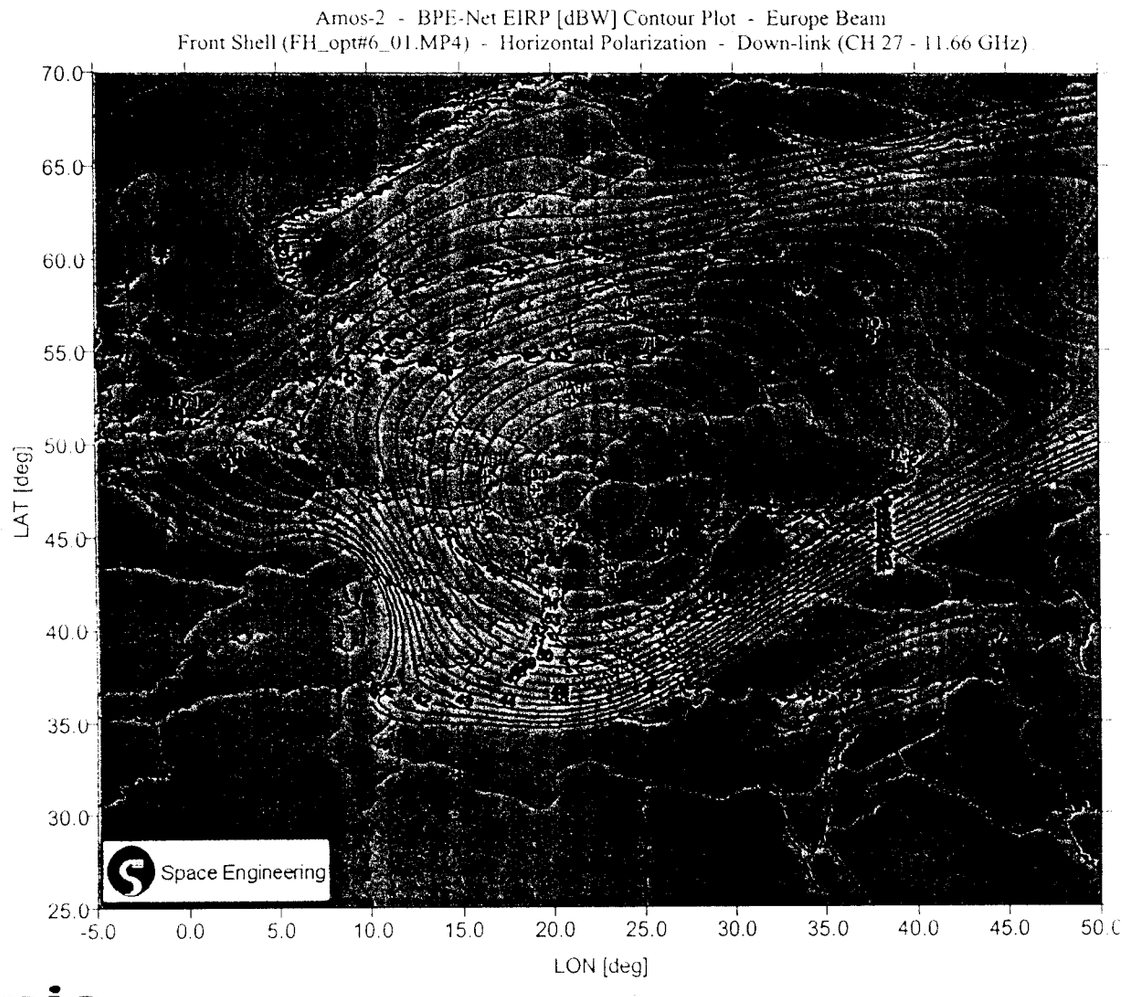
DGA EIRP contour plots: EU H beam



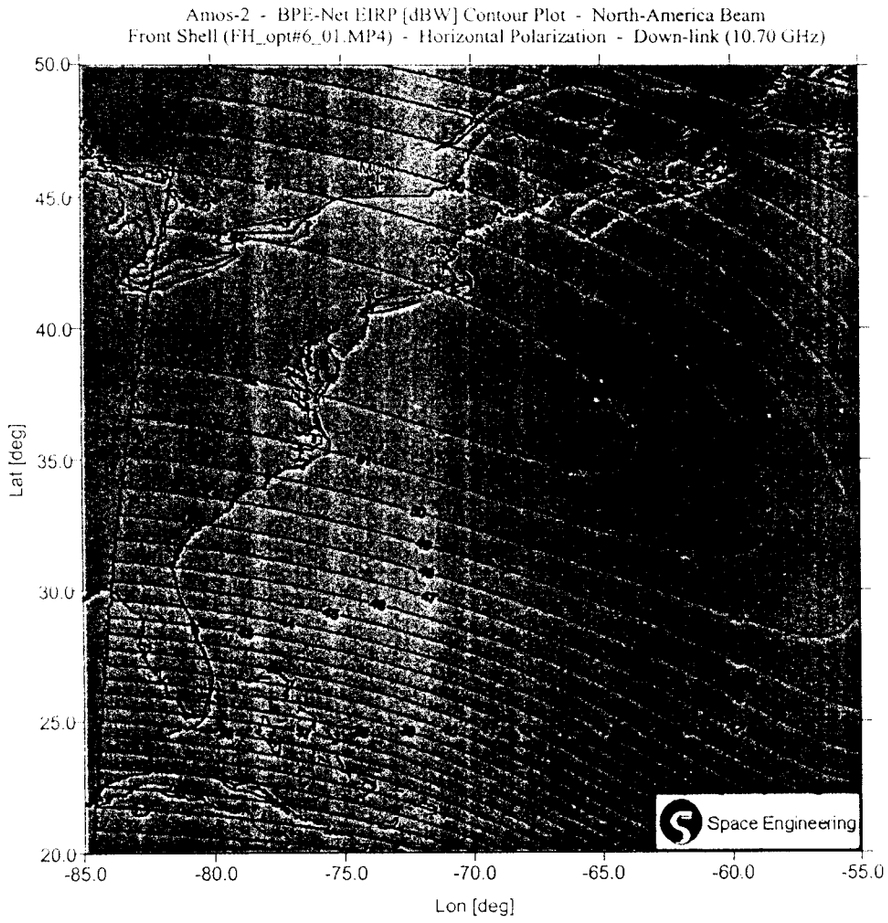
DGA EIRP contour plots: EU H beam, cont'd



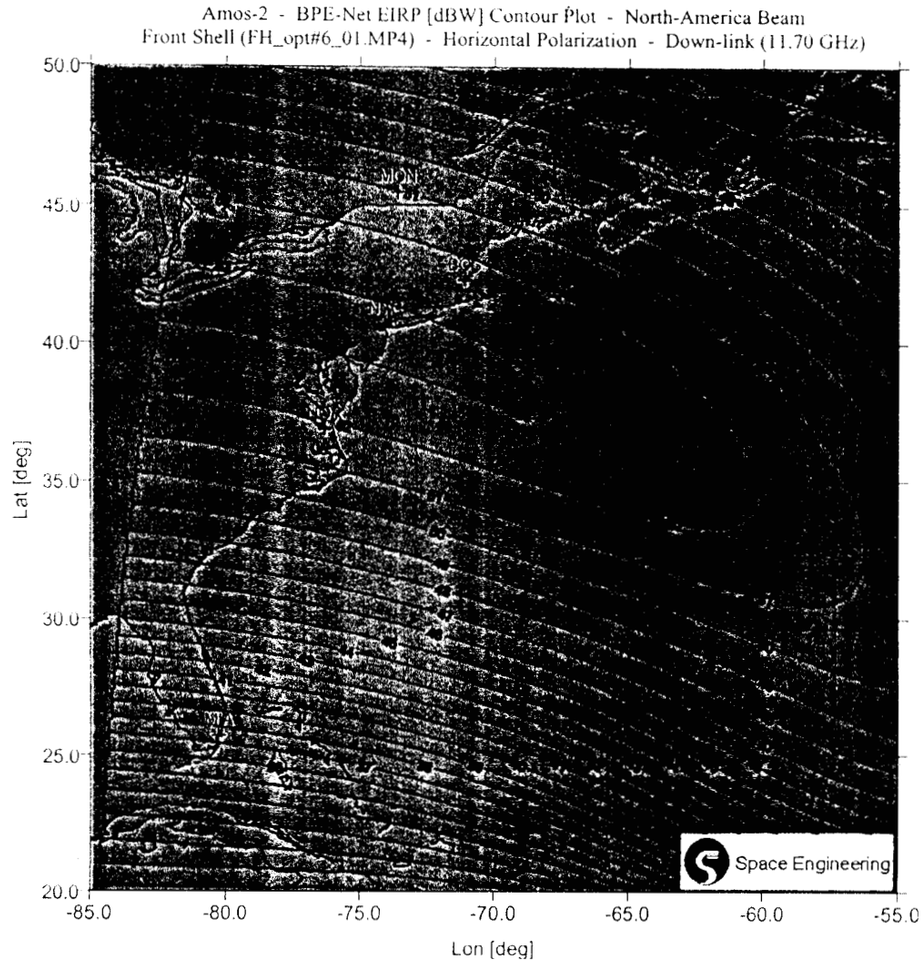
DGA EIRP contour plots: EU H beam, cont'd



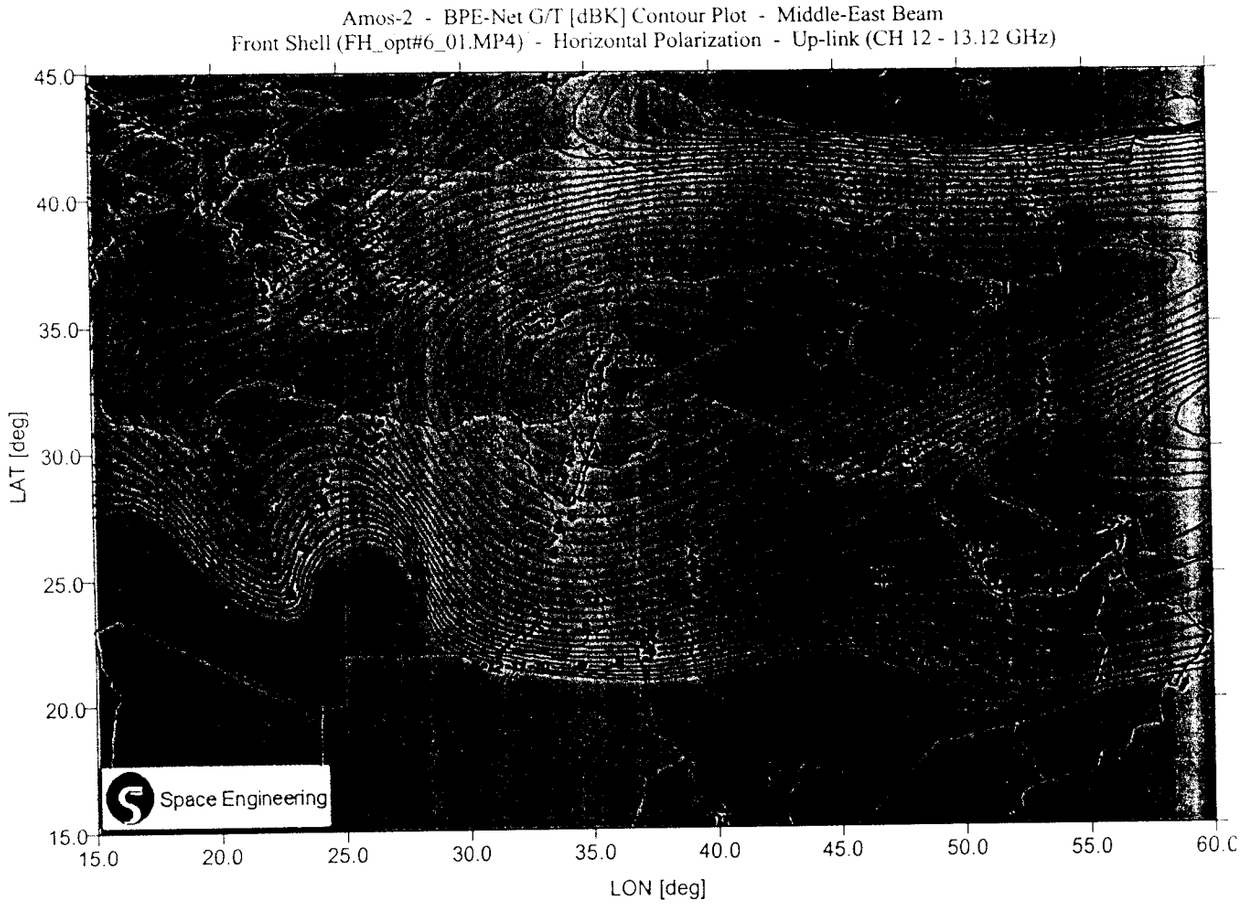
DGA EIRP contour plots: NA H beam



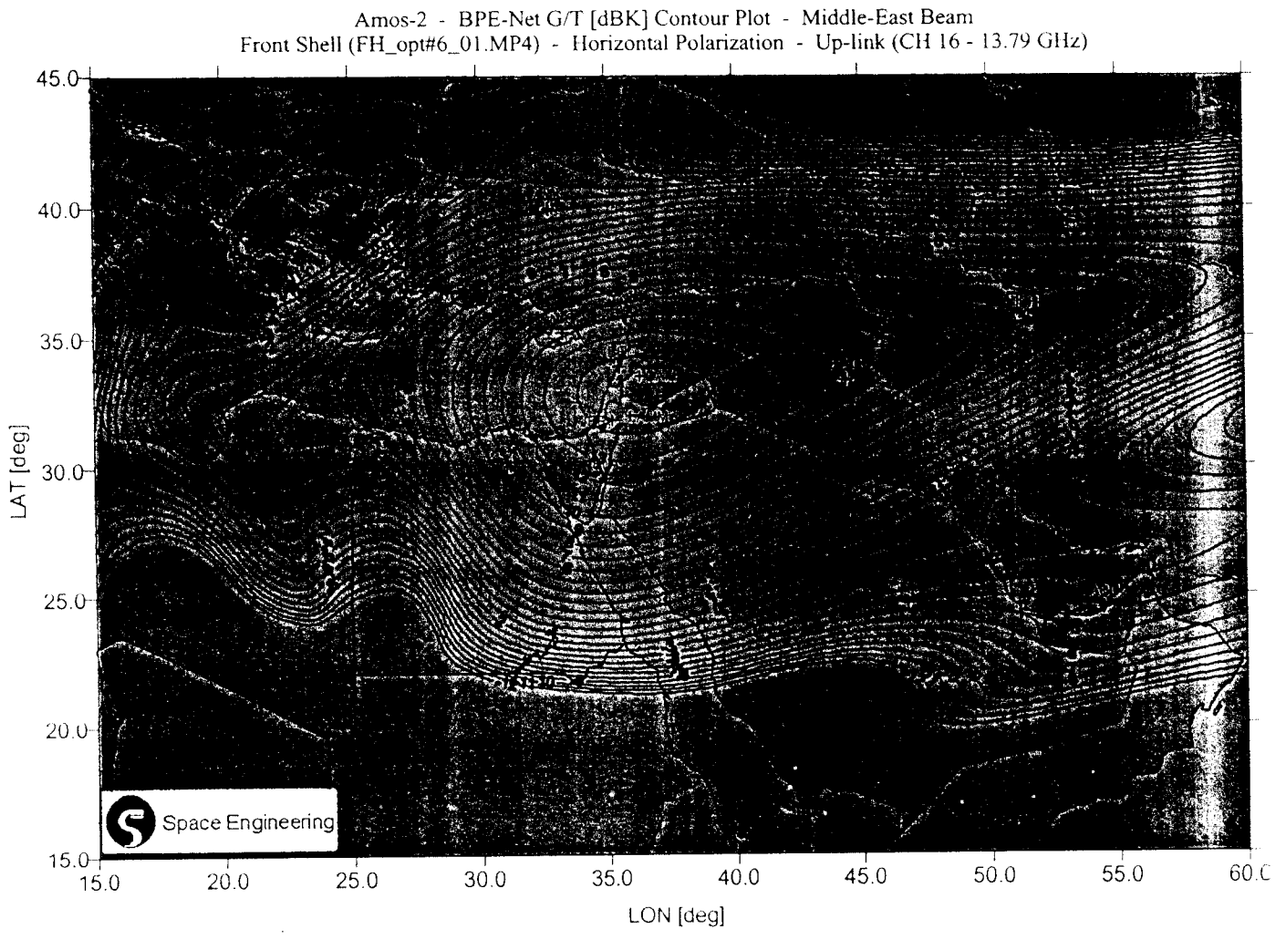
DGA EIRP contour plots: NA H beam, cont'd



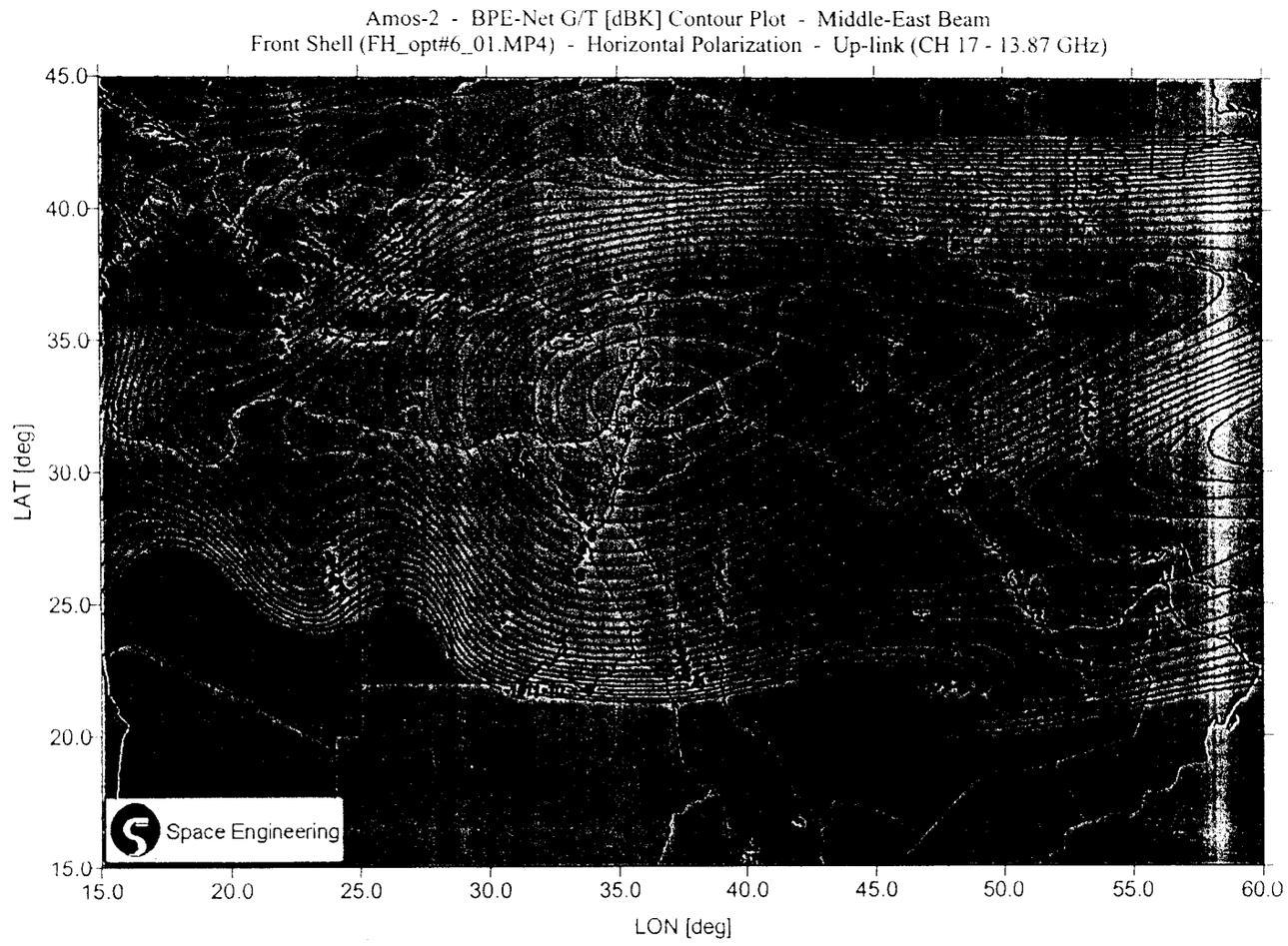
DGA G/T contour plots: ME H beam



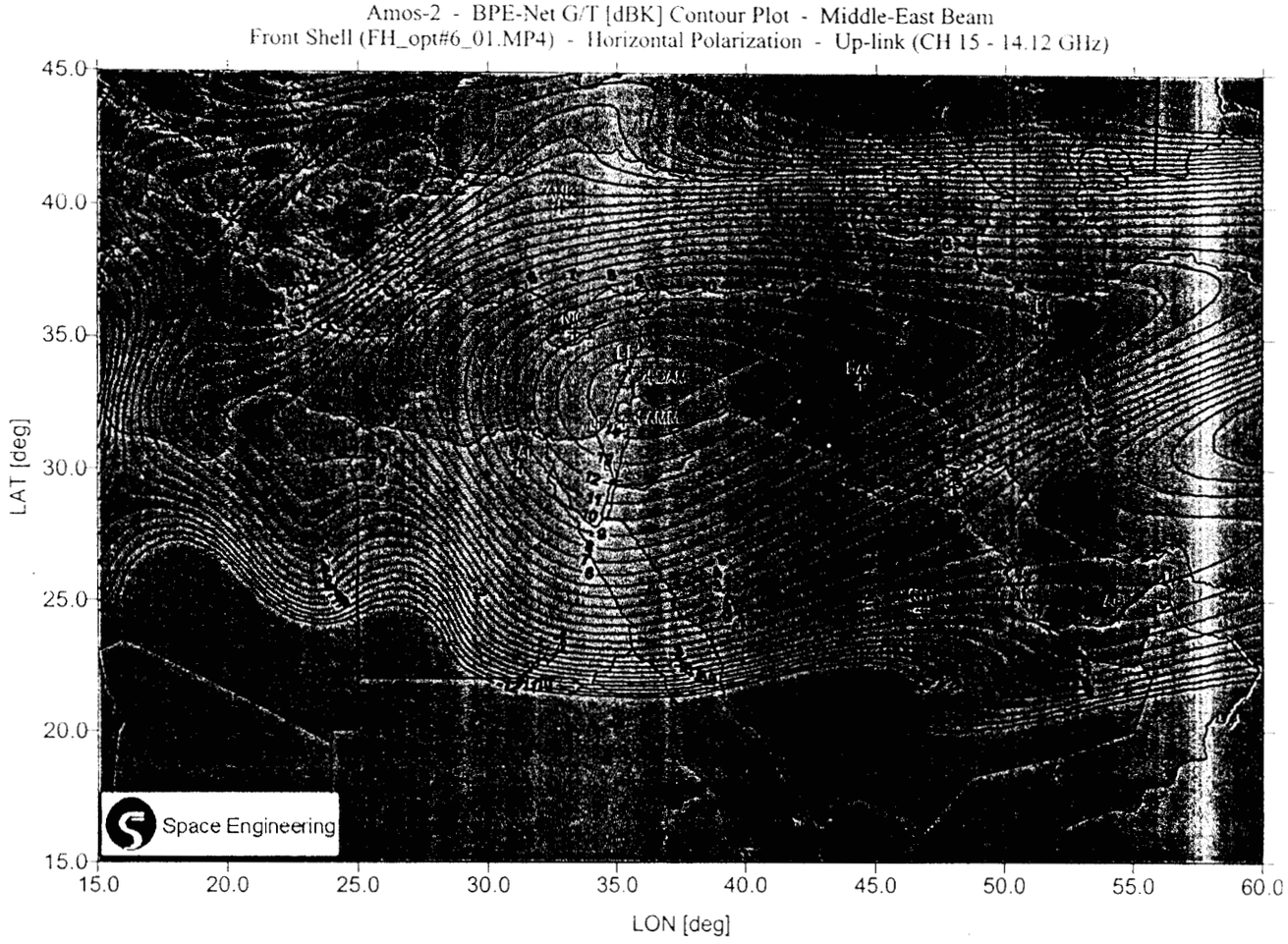
DGA G/T contour plots: ME H beam, cont'd



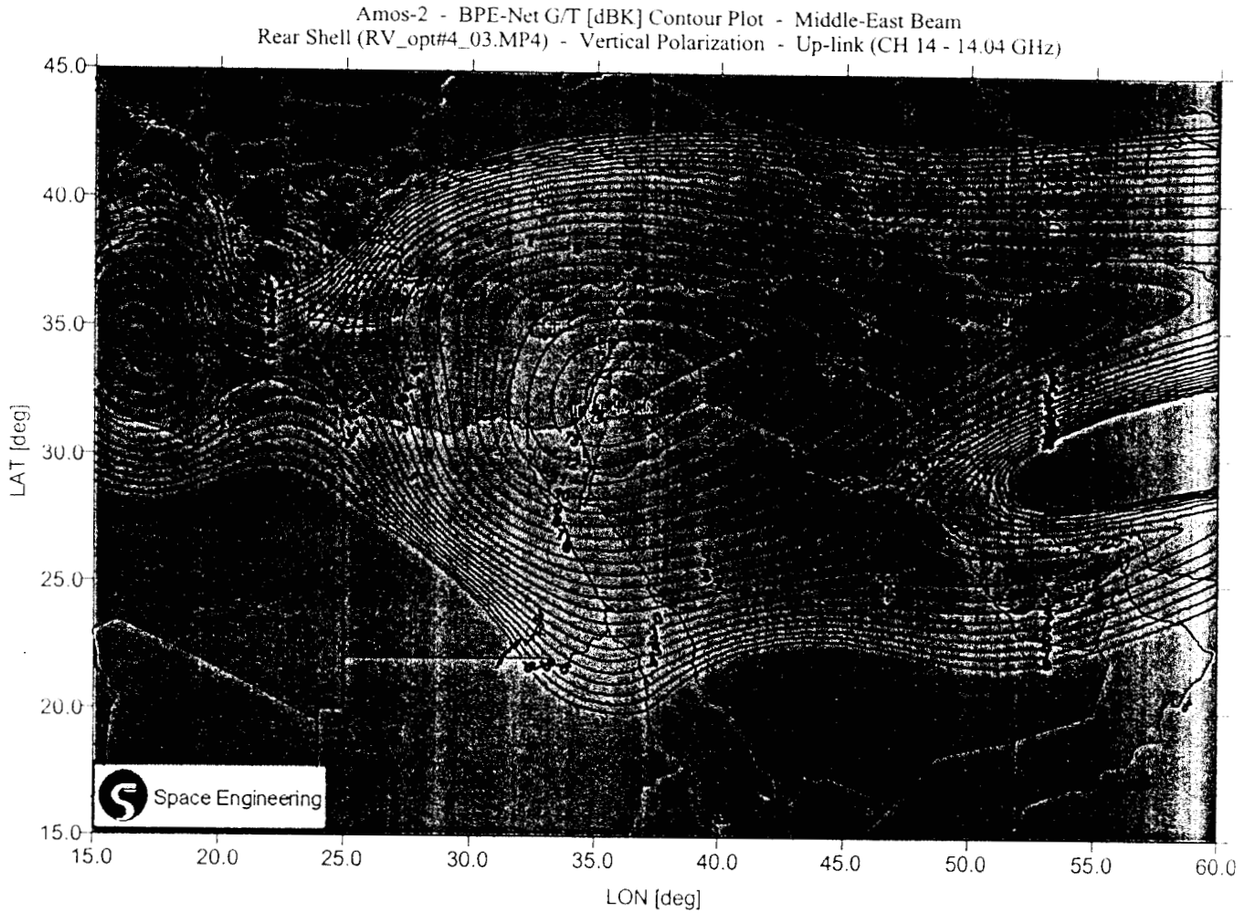
DGA G/T contour plots: ME H beam, cont'd



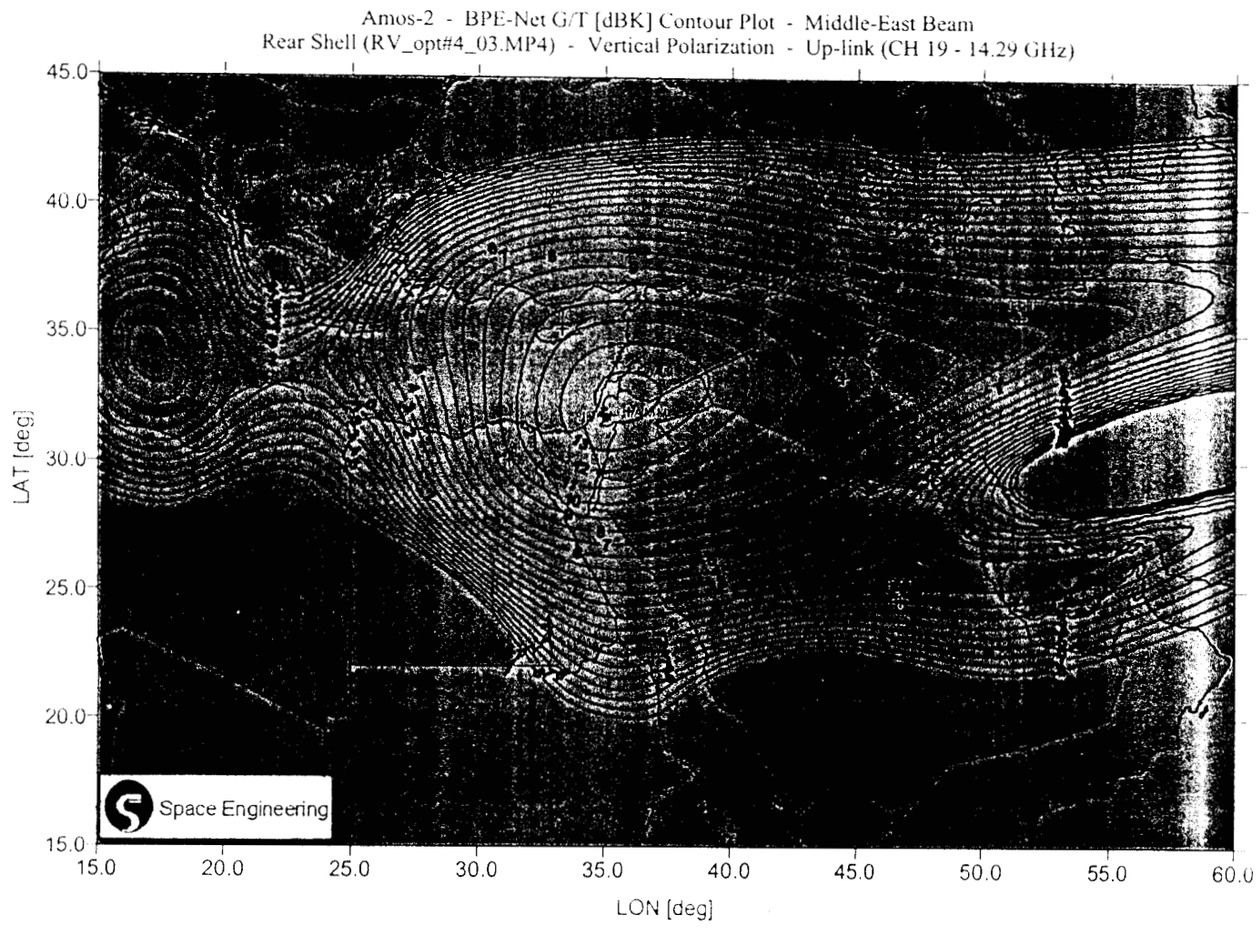
DGA G/T contour plots: ME H beam, cont'd



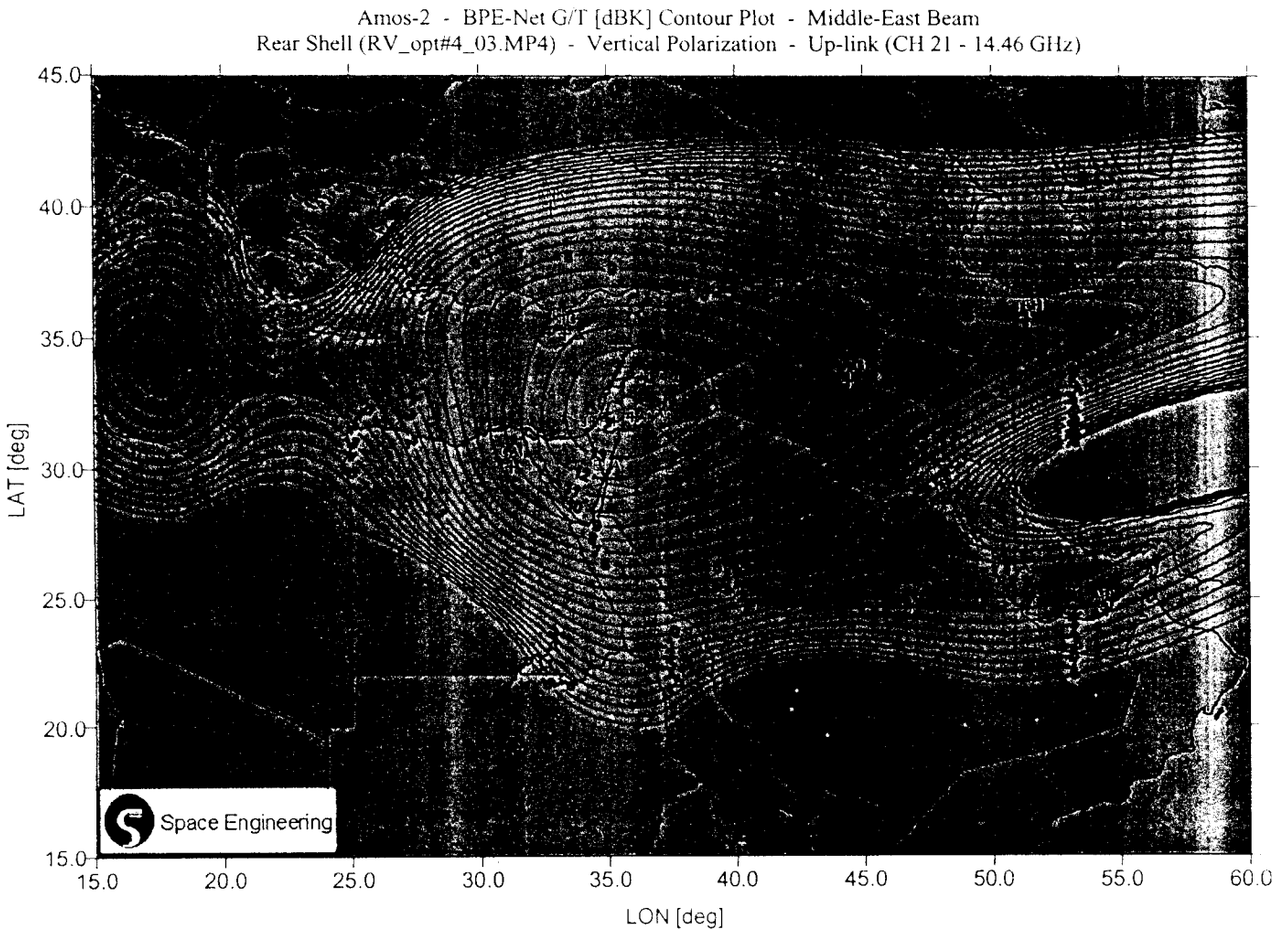
DGA G/T contour plots: ME V beam



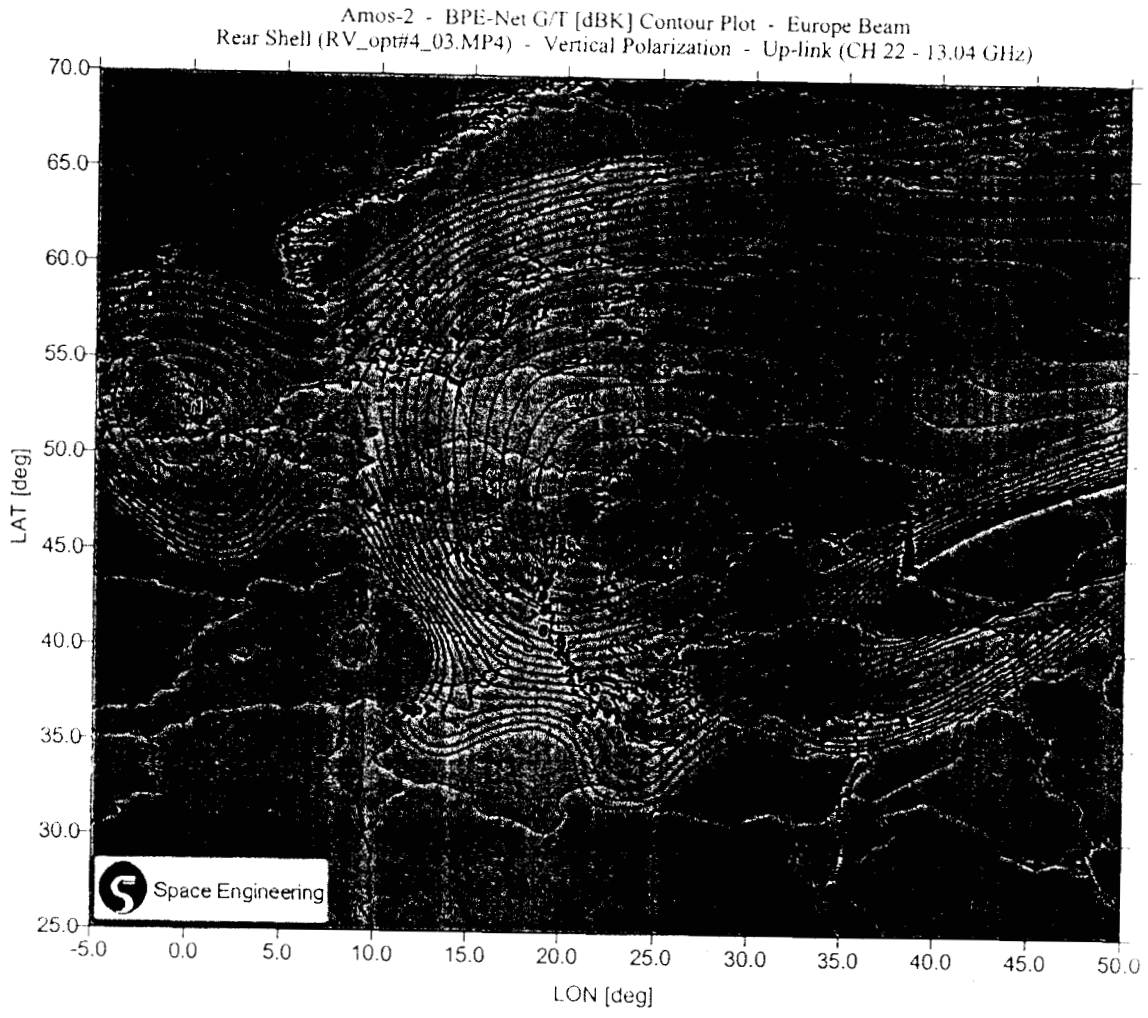
DGA G/T contour plots: ME V beam, cont'd



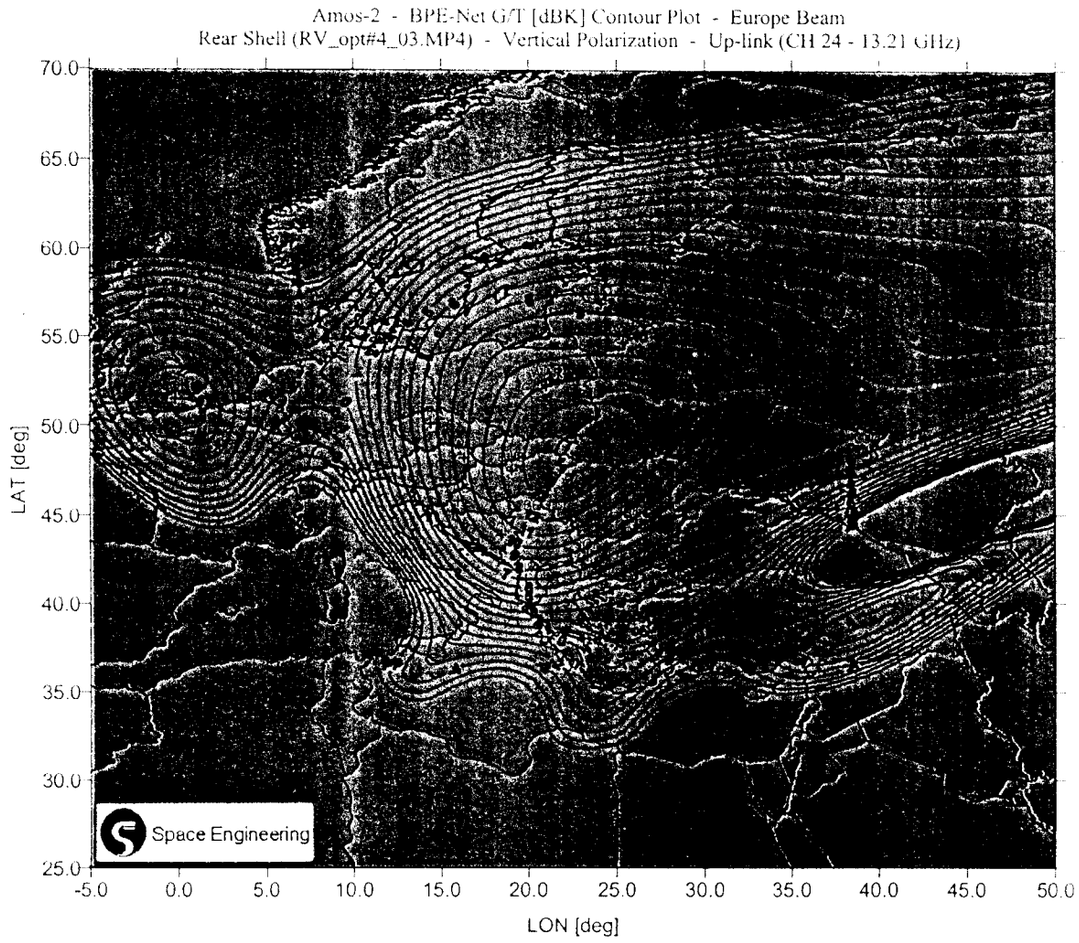
DGA G/T contour plots: ME V beam, cont'd



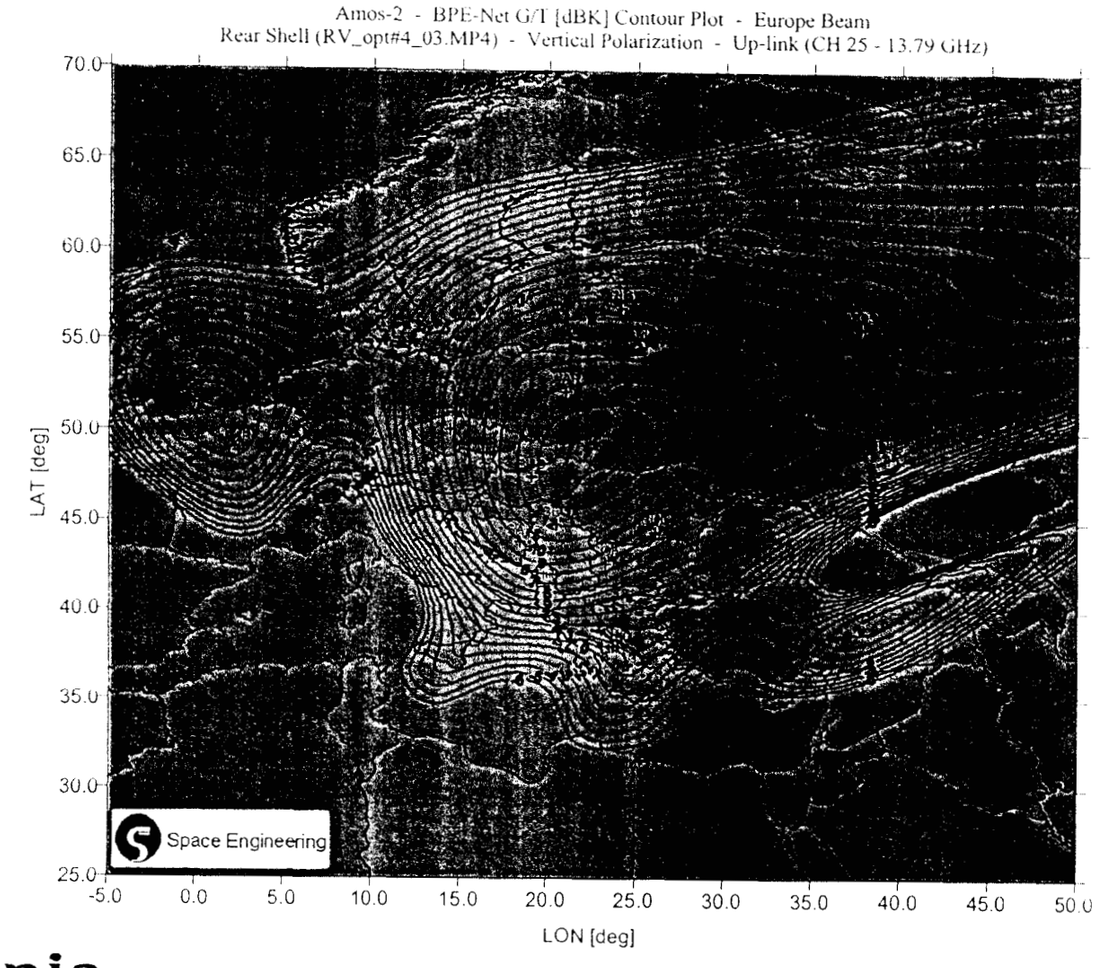
DGA G/T contour plots: EU V beam



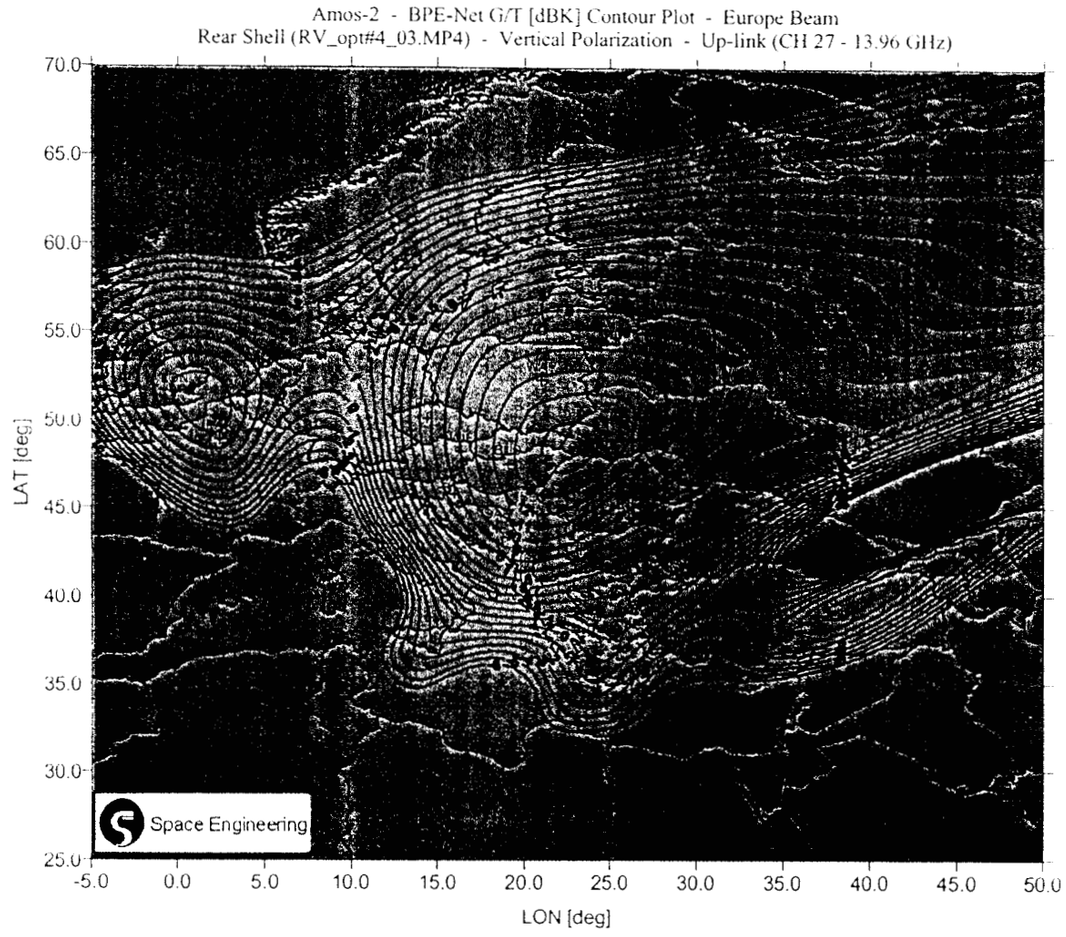
DGA G/T contour plots: EU V beam, cont'd



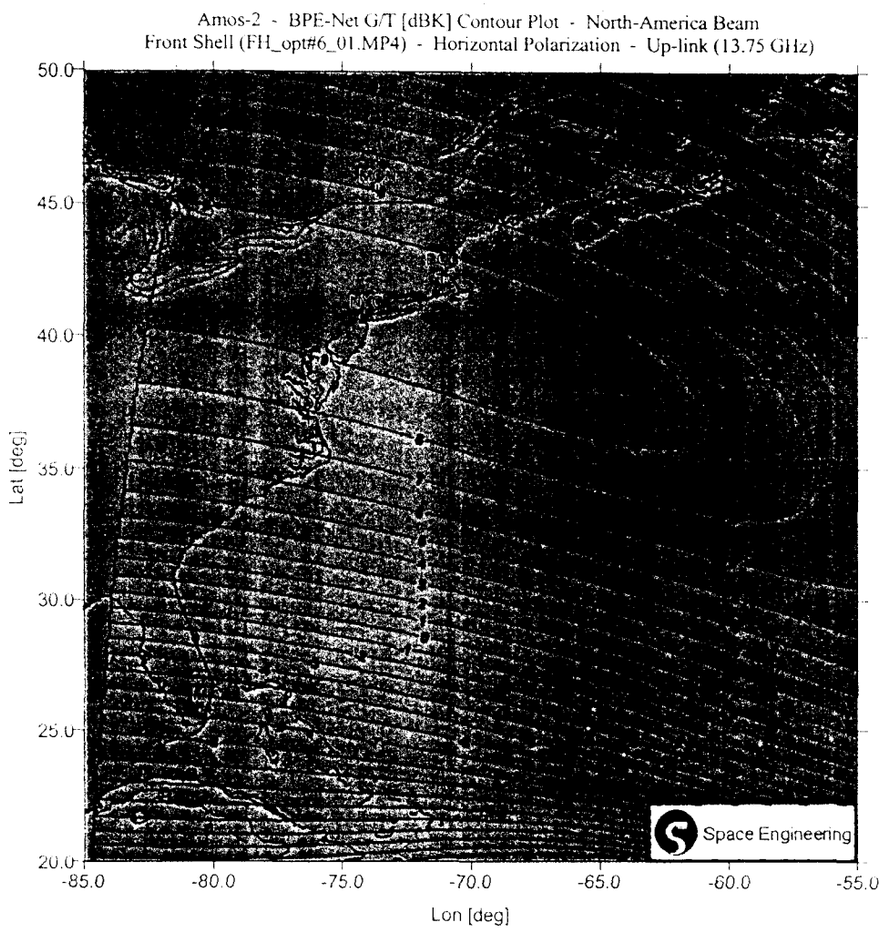
DGA G/T contour plots: EU V beam, cont'd



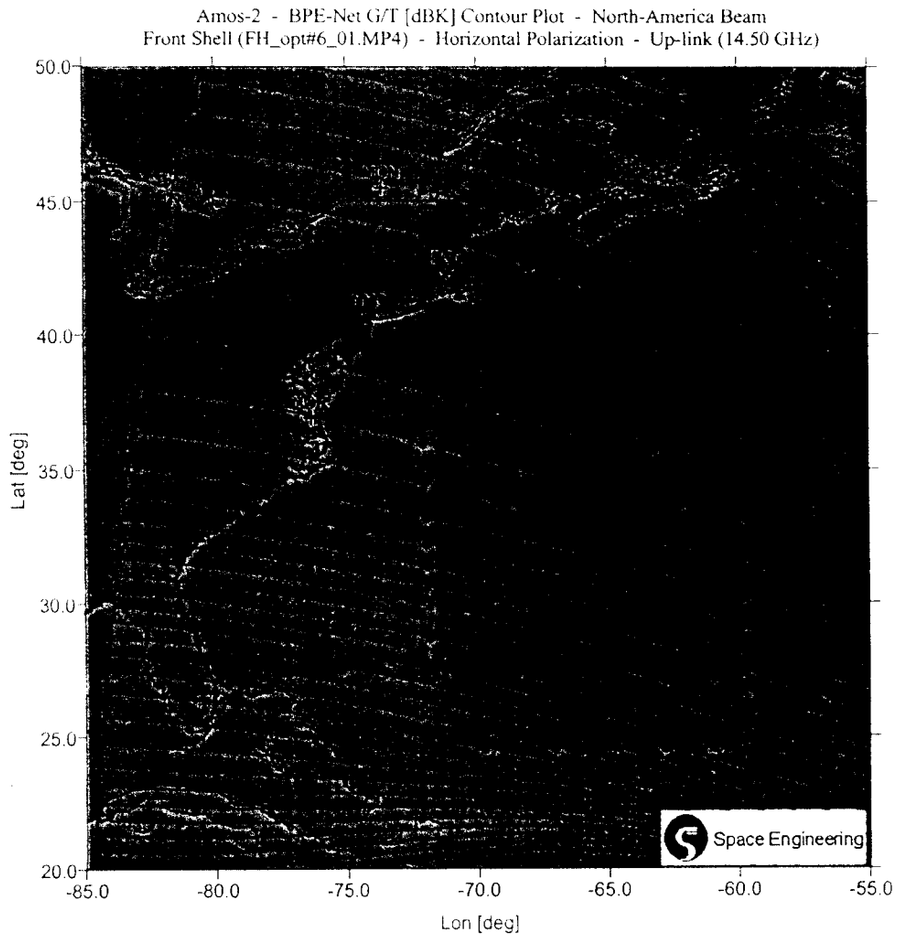
DGA G/T contour plots: EU V beam, cont'd



DGA G/T contour plots: NA H beam



DGA G/T contour plots: NA H beam, cont'd



AMOS-2

DGA & Global Horn

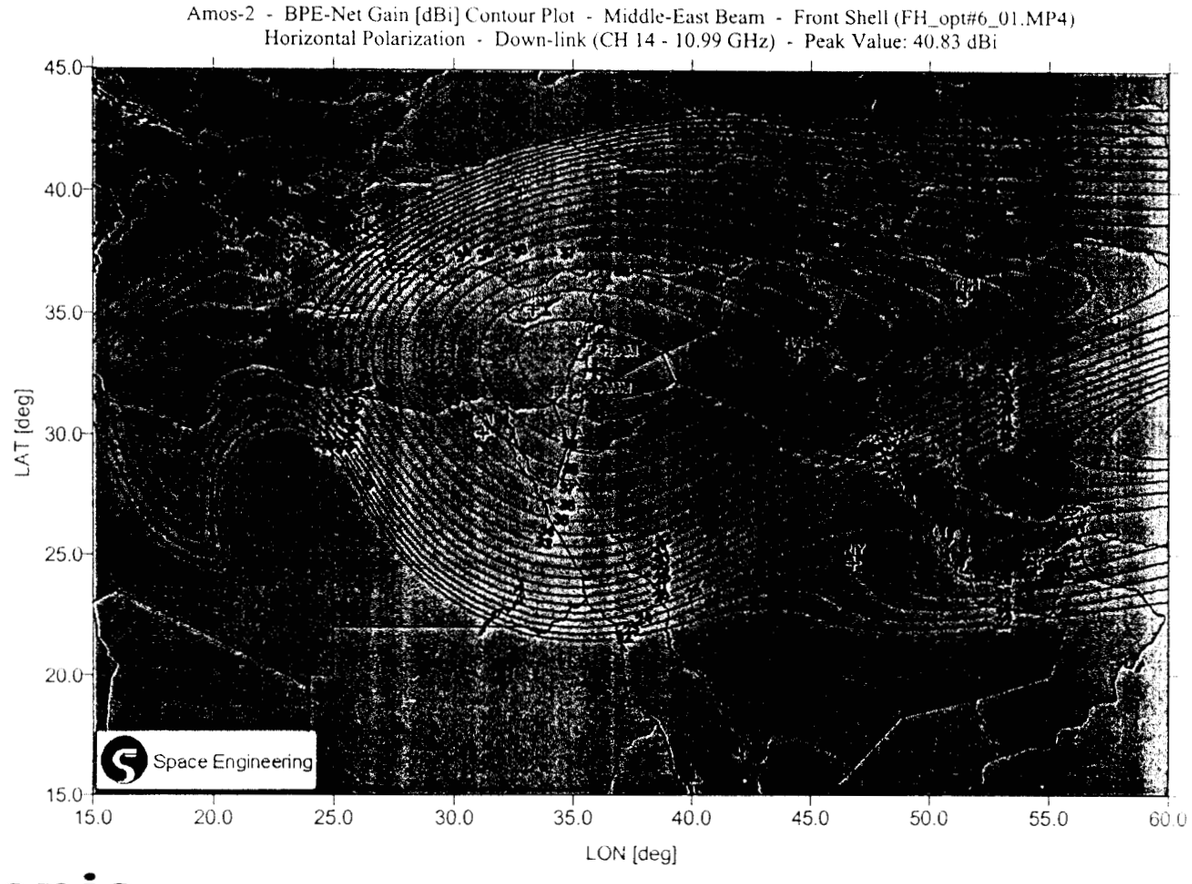
CRITICAL DESIGN REVIEW (CDR)

Gain Contour Plots @ Geographical Coordinates

Alenia

Gain Contour Plots @ Geographical Coordinates (1/9)

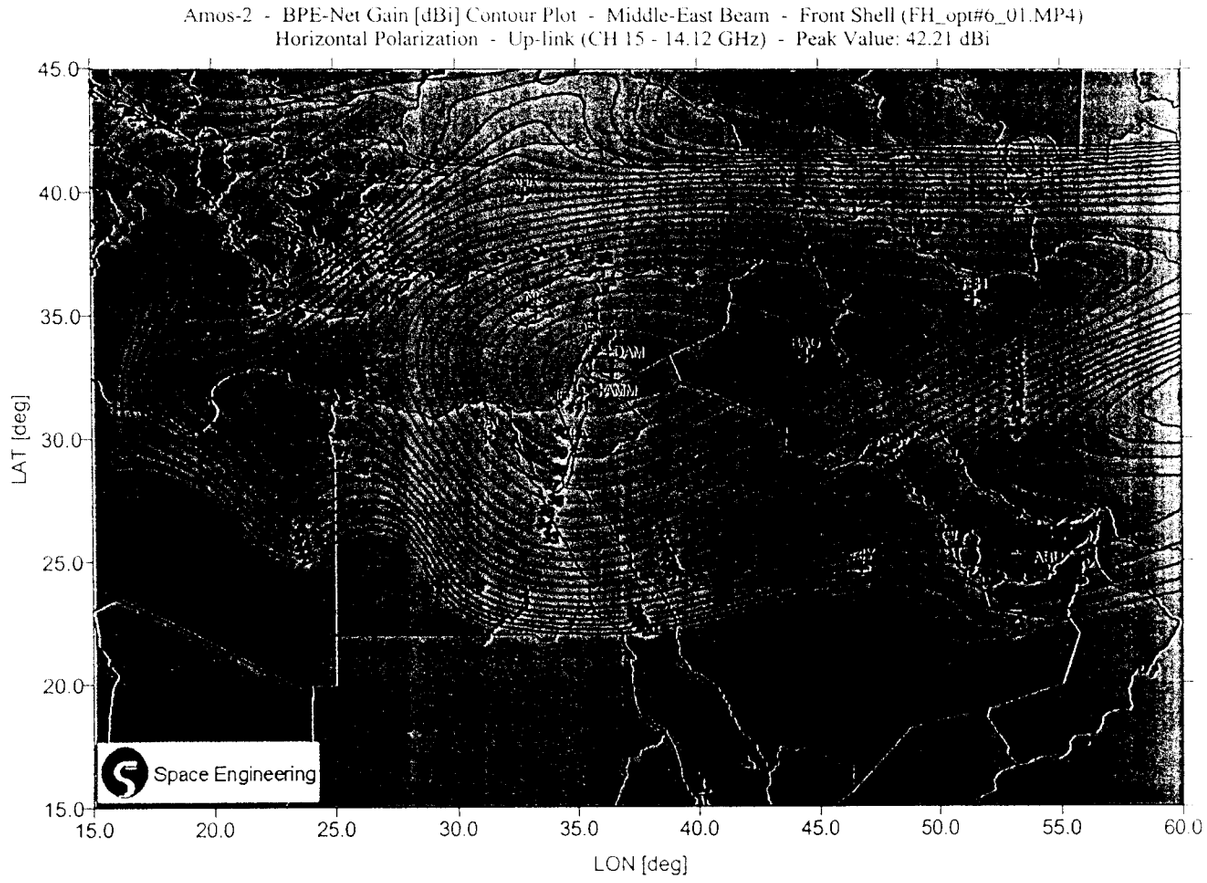
- **Middle-Eastern** Beam, **Horizontal** Polarization, **Down-Link**



Alenia SPAZIO

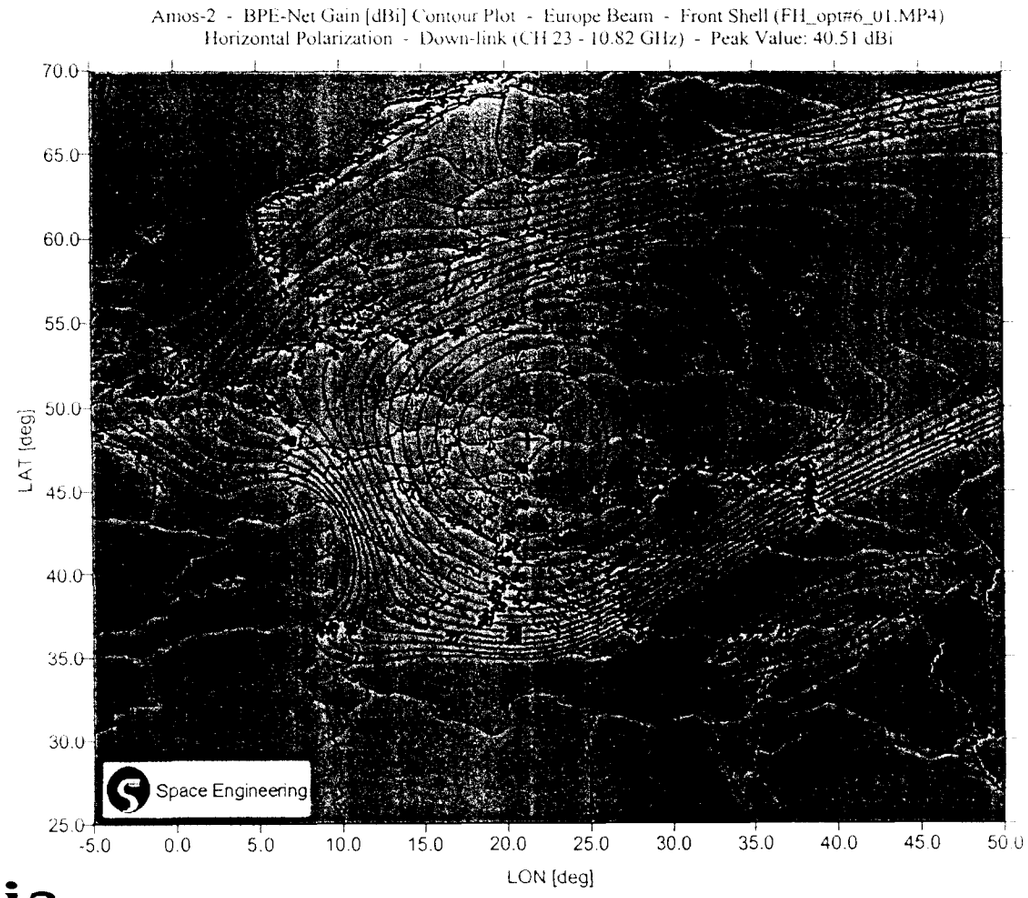
Gain Contour Plots @ Geographical Coordinates (2/9)

- **Middle-Eastern** Beam, **Horizontal** Polarization, **Up-Link**



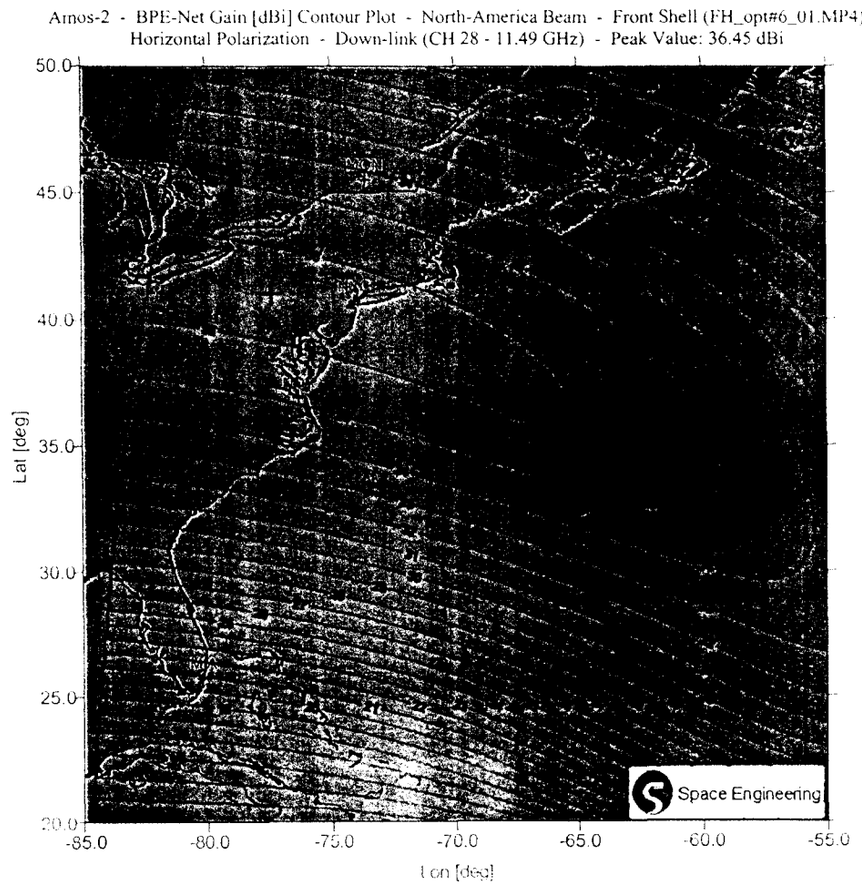
Gain Contour Plots @ Geographical Coordinates (3/9)

- **European** Beam, **Horizontal** Polarization, **Down-Link**



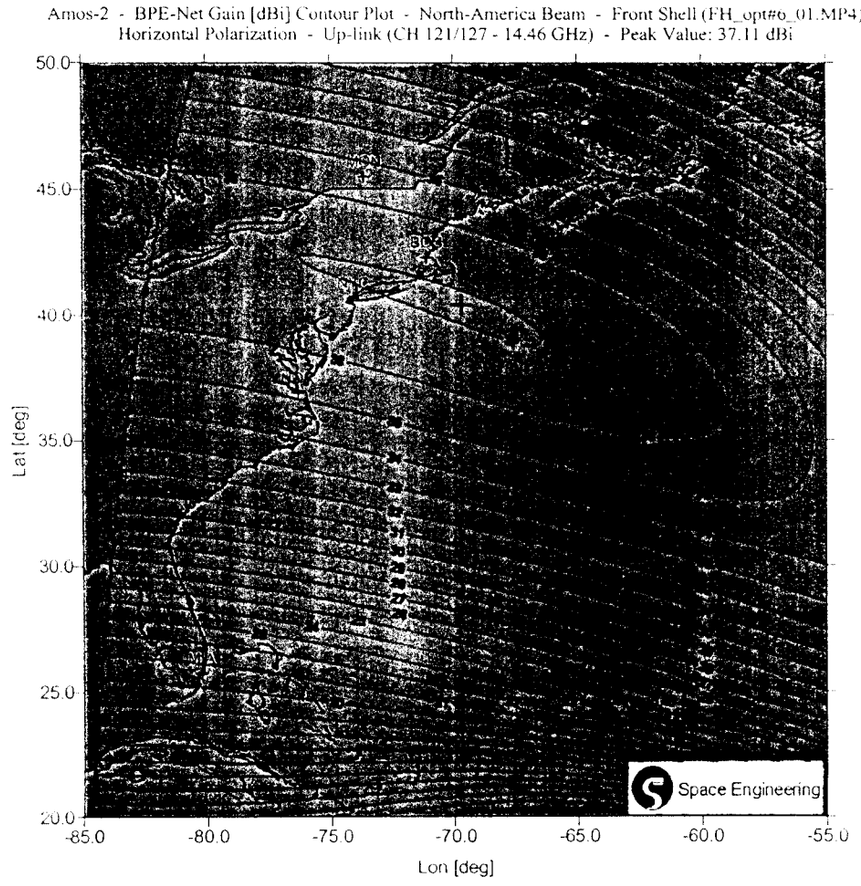
Gain Contour Plots @ Geographical Coordinates (4/9)

- **North-American** Beam, **Horizontal** Polarization, **Down-Link**



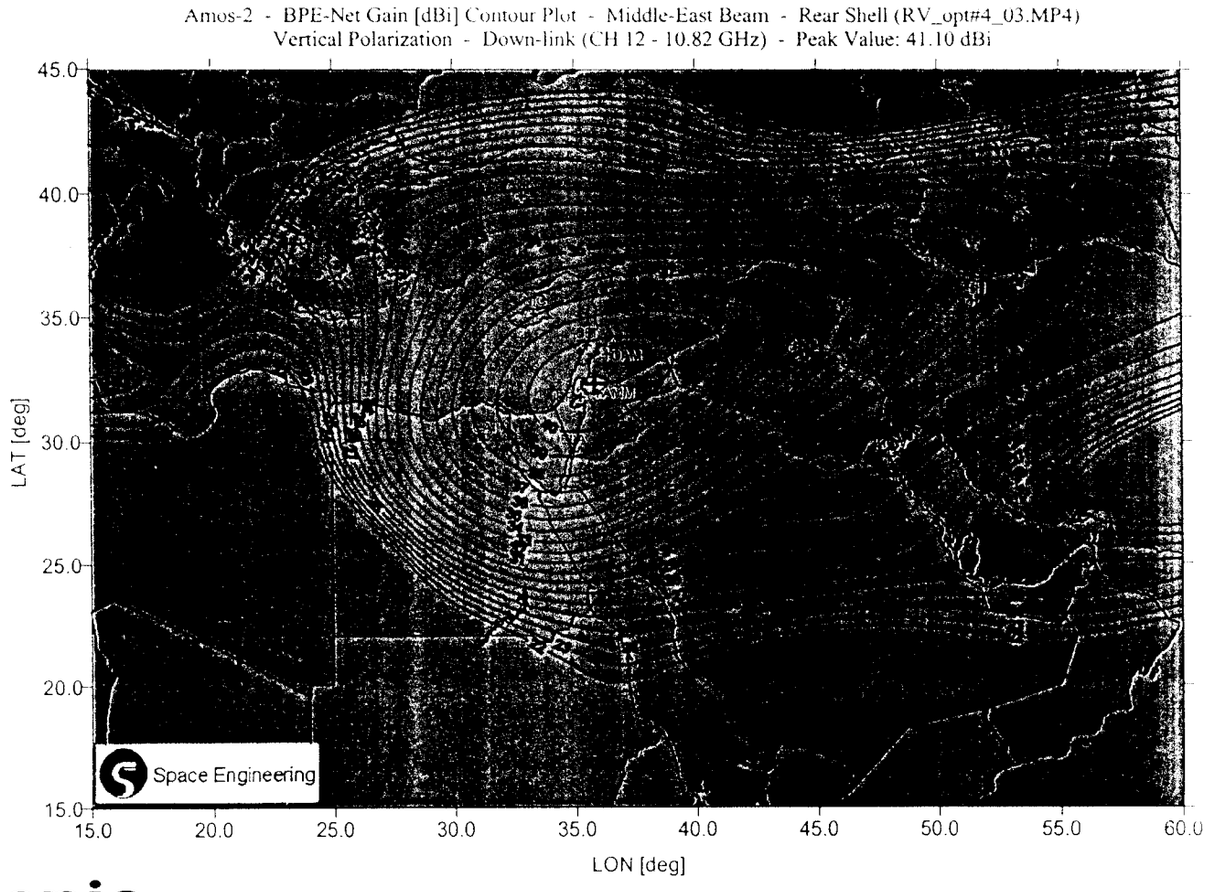
Gain Contour Plots @ Geographical Coordinates (5/9)

- **North-American** Beam, **Horizontal** Polarization, **Up-Link**



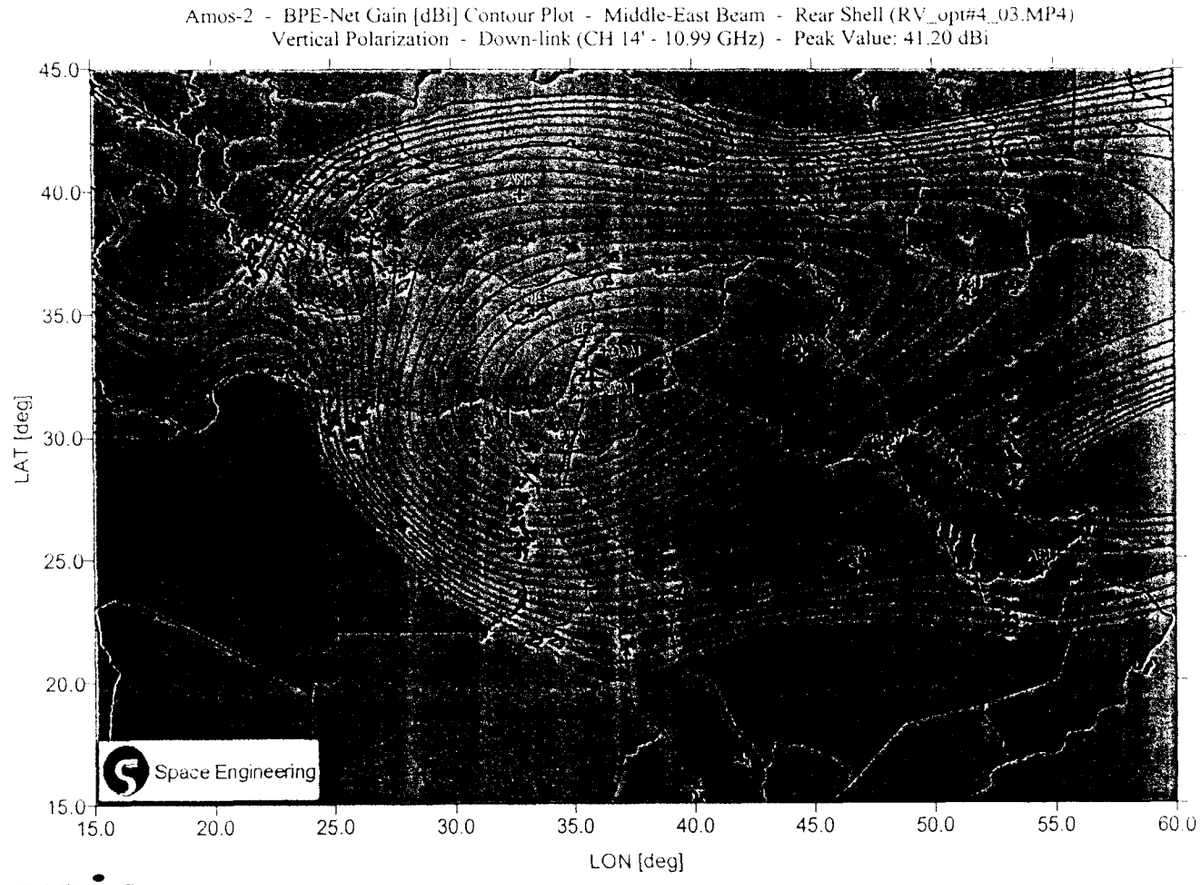
Gain Contour Plots @ Geographical Coordinates (6/9)

- **Middle-Eastern** Beam, **Vertical** Polarization, **Down-Link (10.7÷10.95)**



Gain Contour Plots @ Geographical Coordinates (7/9)

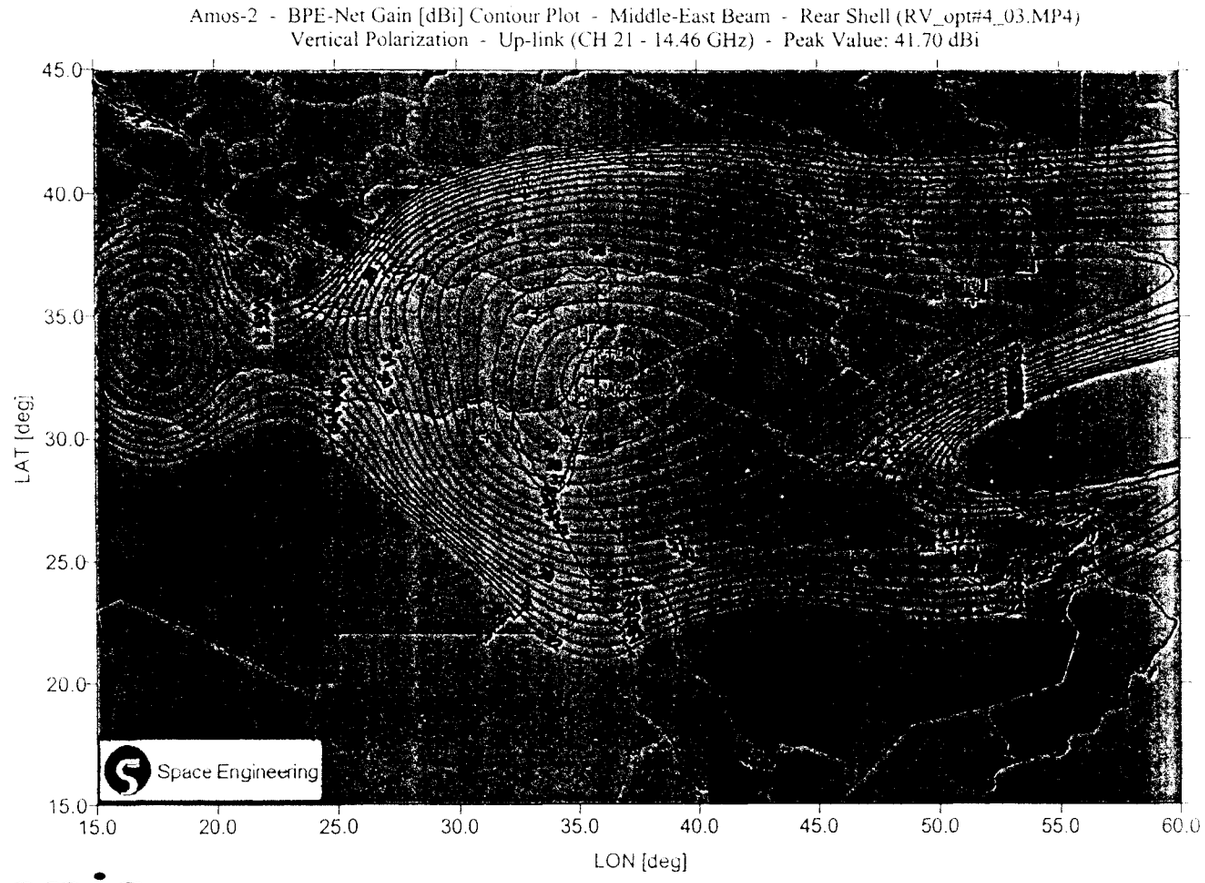
- **Middle-Eastern** Beam, **Vertical** Polarization, **Down-Link (10.95÷11.7)**



Alenia

Gain Contour Plots @ Geographical Coordinates (8/9)

- **Middle-Eastern** Beam, **Vertical** Polarization, **Up-Link**



Alenia

Gain Contour Plots @ Geographical Coordinates (9/9)

- **European** Beam, **Vertical** Polarization, **Up-Link**