



Federal Communications Commission
Washington, DC 20554

International Bureau

June 22, 2006

Dr. Richard A. Barnett
Telecomm Strategies, Inc.
6404 Highland Drive
Chevy Chase, MD 20815

Re: Satélites Mexicanos, S.A. de C.V.
File No. SAT-PPL-20060329-00030
Call Sign: S2695

Dear Dr. Barnett:

On March 29, 2006, Satélites Mexicanos, S.A. de C.V. ("Satmex") filed a Petition for a Declaratory Ruling ("Petition") to add its C- and Ku-band satellite, Satmex 6, located at the 113° W.L. orbital location and which is licensed by Mexico, to the Commission's Permitted Space Station List. To allow us to further process the Petition, Satmex is directed to amend its Petition to address the two issues described below by July 24, 2006.

Satmex identifies physical coordination with EchoStar as the measure to be taken to prevent collisions with satellites known to be located (or reasonably expected to be located) at the 113° W.L. orbital position.¹ In order to facilitate further Commission consideration of Satmex's petition, please provide detailed information regarding the specific technical means (*e.g.*, eccentricity offset) by which such coordination will be effected including a discussion of whether Satmex has assessed the feasibility of implementing a coordination plan based on these technical means.

Section 25.140(b)(2) of the Commission's rules requires applicants for space station authorizations in the fixed-satellite service to demonstrate the compatibility of their proposed systems within two degrees of any authorized space station through an interference analysis.² In its Petition, Satmex provided link noise budgets, modulation

¹ *Public Notice*, International Bureau Satellite Division Information, Disclosure of Orbital Debris Mitigation Plans, Including Amendment of Pending Applications, DA 05-2698, Report No. SPB-112 (rel. Oct. 13, 2005); 47 C.F.R. § 25.114(d).

² 47 C.F.R. § 25.140(b)(2). The Bureau has issued two public notices providing guidance to potential applicants on this rule. See International Bureau Satellite Division Information: Clarification of 47 C.F.R. § 25.140(b)(2), Space Station Application Interference Analysis, *Public Notice*, 18 FCC Rcd 25099 (2003); International Bureau Satellite Division Information: Clarification of 47 C.F.R. § 25.140(b)(2), Space Station Interference Analysis, *Public Notice*, 19 FCC Rcd 10652 (2004) (collectively *2003 and 2004 Interference Public Notice*).

parameters, and overall link performance analyses for both its analog and digital carriers, consistent with the requirements of 25.140(b)(2). In addition, Satmex provided an interference analysis which demonstrates that the digital signals from its proposed space station are compatible with those of space stations located two degrees away.³ This interference analysis complies with Section 25.140(b)(2) and the *2003 and 2004 Public Notices*. Nevertheless, the analysis does not address analog TV/FM signals because, according to Satmex, in general, co-polarized, co-frequency narrow-to-medium band digital transmissions cannot adequately co-exist within the energy dispersal band of an analog TV carrier transmitted by an adjacent satellite. For this reason, the C- and Ku-band interference analyses only took into account the digital carriers of the two networks.⁴ We acknowledge that rule section 25.140(b)(2) provides discretion to applicants regarding the radiofrequency carriers for which interference analyses are provided.⁵ In order to provide clarity to potential future applicants, however, we believe that an interference analysis which includes the analog TV/FM signals should be included with the subject Petition.⁶ Accordingly, to allow for the prompt processing of its Petition, Satmex is directed to file an amendment to its Petition to include such an analysis by July 24, 2006. If Satmex fails to respond to file the amendment by July 24, 2006, its Petition may be dismissed pursuant to sections 25.112(c) and 25.152(b) of the Commission's rules.⁷ You may contact Jay Whaley at Jay.Whaley@fcc.gov, if you have any questions.

Sincerely,



Cassandra C. Thomas
Deputy Chief,
Satellite Division

³ See Satmex Application at Annex 1, Interference and PFD Analysis, pp. A1-1 through A1-2.

⁴ *Id.* at A1-2.

⁵ See 47 C.F.R. § 25.140(B)(2) ("An applicant should provide details of its proposed r.f. carriers which it believes should be taken into account in this analysis.").

⁶ See Letter to Nancy J. Eskenazi, Vice President and Associate General Counsel, SES Americom, Inc., from Robert G. Nelson, Chief, Satellite Engineering Branch, Satellite Division, FCC, (August 29, 2005).

⁷ See also *Amendment of the Commission's Space Station Licensing Rules and Policies* (First Report and Order), FCC 03-102, 18 FCC Rcd 10760 at ¶ 244 (2003).