

LAW OFFICES
GOLDBERG, GODLES, WIENER & WRIGHT LLP
1229 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036-2413

HENRY GOLDBERG
JOSEPH A. GODLES
JONATHAN L. WIENER
LAURA A. STEFANI
DEVENDRA ("DAVE") KUMAR

HENRIETTA WRIGHT
THOMAS G. GHERARDI, P.C.
COUNSEL

THOMAS S. TYCZ*
SENIOR POLICY ADVISOR
*NOT AN ATTORNEY

(202) 429-4900
TELECOPIER:
(202) 429-4912

e-mail:
general@g2w2.com
website: www.g2w2.com

January 27, 2014

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: FCC File No. SAT-PPL-20130430 – 00064, *Petition of Hispasat S.A. ("Hispasat") for a Declaratory Ruling ("Petition") to Add the Amazonas-1 Space Station at the 36° W.L. Orbital Location to the Commission's Permitted Space Station List in the 11.7-12.2 GHz (Space-to-Earth) and 14.0-14.5 GHz (Earth-to-Space) Frequency Bands and to Access the U.S. Market via Amazonas-1 at 36° W.L. in the 13.75-14.0 GHz (Earth-to-Space) Frequency Band (Int'l Bur Dec. 27, 2013), DA 13-2473 ("Hispasat Grant")*

Dear Ms. Dortch:

Skynet Satellite Corporation ("Skynet") hereby requests clarification concerning the conditions imposed by the Commission in the above-referenced *Hispasat Grant*. More particularly, Skynet requests confirmation that should the technical parameters in Hispasat's coordination agreements be more restrictive than the technical parameters that Hispasat provided in its above-referenced Petition, then Hispasat would have to abide by the more restrictive coordination conditions.

Skynet holds an FCC license to operate Telstar 11N at 37.55° W.L.¹ Hispasat's Ku-band uplink and downlink frequencies at 36.0° W.L. overlap with Skynet's Ku-band

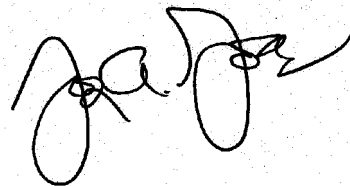
¹ FCC File No. SAT-MOD-20060306-00024, Application for Modification of Authorization (Int'l. Bur Dec. 4, 2007), DA 07-5001.

uplink and downlink frequencies at 37.55° W.L. Skynet and Hispasat are parties to a Satellite Coordination Agreement, dated November 15, 2011 (“Coordination Agreement”), that addresses these operations.²

In its Petition, Hispasat committed to operating in accordance with its coordination agreements in order to avoid causing unacceptable interference to adjacent satellites, including Telstar 11N.³ And the *Hispasat Grant* includes a condition requiring that Hispasat comply with all existing and future space station coordination agreements.⁴

Notwithstanding Hispasat’s commitment and the condition on the *Hispasat Grant*, there is a potential ambiguity because: (i) some of the uplink and downlink parameters provided by Hispasat in its Petition, including the parameters shown in Hispasat’s link budgets, exceed the limits Hispasat has coordinated with Skynet; and (ii) the *Hispasat Grant* states that Amazonas-1 must be operated in accordance with the terms, conditions, and technical specifications that were contained in Hispasat’s Petition.⁵ To eliminate this potential ambiguity and ensure that Hispasat’s commitments and the conditions in the *Hispasat Grant* are given proper effect, Skynet requests that the Commission clarify that if the technical parameters shown in Hispasat’s Petition exceed coordinated limits, then Hispasat must observe the coordinated limits.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joe Godles", with a stylized flourish at the end.

Joseph A. Godles
Attorney for *Skynet Satellite Corporation*

cc (via e-mail and US mail): Vicente Rubio, Hispasat

² The ITU filing associated with Telstar 11N (USASAT-26A), which has been notified, has ITU priority over the ITU filing associated with Amazonas-1 (HISPASAT 2A 36W), which is in coordination.

³ Petition, Section 25.114(d) Technical Showing, at 4. See also Petition, Section 25.114(c) Technical Showing, at 4.

⁴ *Hispasat Grant*, Condition 2.

⁵ *Hispasat Grant*, Introductory Paragraph.