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Federal Communications Commission
Office of Secretary

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Policy Branch
International Bureau

VIA HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, N.W.
Washington, D.C. 20554

Re: **WRITTEN EX PARTE PRESENTATION**
File No. SAT-STA-20050325-00076
Application of SES Americom, Inc. for Special Temporary Authority
To Repoint Satcom SN-4

Dear Ms. Dortch:

The Boeing Company ("Boeing") hereby files this letter to further supplement the record in the above-captioned application proceeding. On March 25, 2005, SES Americom, Inc. filed an application for Special Temporary Authority ("STA") requesting authority to repoint the Satcom SN-4 satellite and provide Ku-band service over water areas of International Telecommunication Union ("ITU") Region 1.¹ On March 29, 2005, Boeing filed an *ex parte* letter in support of SES Americom's STA application and related modification application.² This letter provides additional information regarding the extraordinary circumstances justifying grant of SES Americom's STA application.

¹ See Application of SES Americom, Inc. for Special Temporary Authority to Repoint Satcom SN-4, File No. SAT-STA-20050325-00076 (filed March 25, 2005). SES Americom also filed an accompanying modification application seeking, among other things, permanent authority for operational changes requested in the STA application. See Application of SES Americom, Inc. for Modification of Satcom SN-4 Fixed Satellite Space Station License, File No. SAT-MOD-20050325-00075 (filed March 25, 2005).

² See Letter to Marlene H. Dortch from Carlos M. Nalda, File Nos. SAT-STA-20050325-00076 and SAT-MOD-20050325-00075 (dated March 29, 2005).

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As the Commission is aware, grant of the STA application will enable SES Americom to provide Boeing with Ku-band satellite capacity for the Connexion by BoeingSM system to provide interim Pacific Ocean region ("I-POR") coverage pending launch of the AMC-23 satellite later this year. In addition to Satcom SN-4, I-POR coverage will be implemented using the Intelsat I-605, Superbird C and NSS-5 satellites. However, only the Satcom SN-4 satellite requires repointing to provide optimal coverage for I-POR service. Thus, it is the only satellite for which additional regulatory authority is required for use in connection with I-POR coverage.

The Satcom SN-4 satellite is an essential element of Boeing's I-POR coverage. As indicated in the attached Microsoft PowerPoint slide, Satcom SN-4 will provide the largest Pacific Ocean area coverage of any I-POR satellite, and it will be the only satellite serving the critical Northern Pacific commercial air routes linking Asia and North America. Without access to Satcom SN-4, Boeing cannot provide seamless Pacific Ocean region coverage to its airline customers, including All Nippon Airways ("ANA"), Japan Airlines ("JAL") and Singapore Airlines ("SIA"), which are presently equipped and operating with the Connexion by BoeingSM system.

As highlighted in SES Americom's STA application, Boeing's I-POR coverage is scheduled to commence on April 15, 2005, and satellite testing prior to commencement of service needs to occur beginning April 1, 2005. In this connection, Boeing currently has technical personnel on the ground at its gateway facility on Vancouver Island, Canada standing by to commence testing with Satcom SN-4 upon grant of the requested STA. In addition, the Boeing's Connexion 1 testbed and demonstration aircraft is scheduled to make a Pacific Ocean region flight on April 7, 2005 to test I-POR coverage, including system performance with the Satcom SN-4 satellite. Boeing's imminent program of testing, which will continue through early May 2005, is critical to ensure that I-POR coverage can commence commercially after testing has been completed.

Boeing would also note the SES Americom and Boeing met with representatives of the International Bureau staff on January 18, 2005 to discuss issues associated with repointing Satcom SN-4 in the context of Boeing's I-POR coverage. Given the need to modify Satcom SN-4's operating authority in a relatively short time frame, a space station modification application accompanied by an STA application (in the event that the modification application could not be granted in time) was considered an appropriate procedural approach. Although certain technical complexities associated with application development in the context of Satcom SN-4 repointing delayed submission of the applications, grant of an STA during the pendency of the underlying modification application remains appropriate.

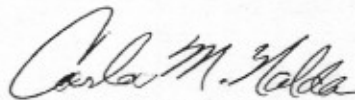
Marlene H. Dortch
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In particular, the Satcom SN-4 satellite will provide interim service only pending launch of the AMC-23 satellite, which includes a payload designed to provide full Pacific Ocean region coverage for Boeing. Furthermore, as described above, there are extraordinary factual circumstances supporting the pressing need for expedited grant of an STA in this case. Finally, SES Americom seeks an STA to operate for a brief 60-day period on a non-harmful interference basis only, and recognizes that the STA is subject to change or cancellation at any time upon reasonable notice and that any action taken pursuant to the STA is at its own risk and without prejudice to any action the Commission might take on the related Satcom SN-4 space station modification application.

For all of the foregoing reasons, Boeing respectfully requests that the Commission accord SES Americom's STA application expedited treatment and grant the requested STA at the earliest possible time.

Please feel free to contact the undersigned with any questions regarding this submission.

Respectfully submitted,



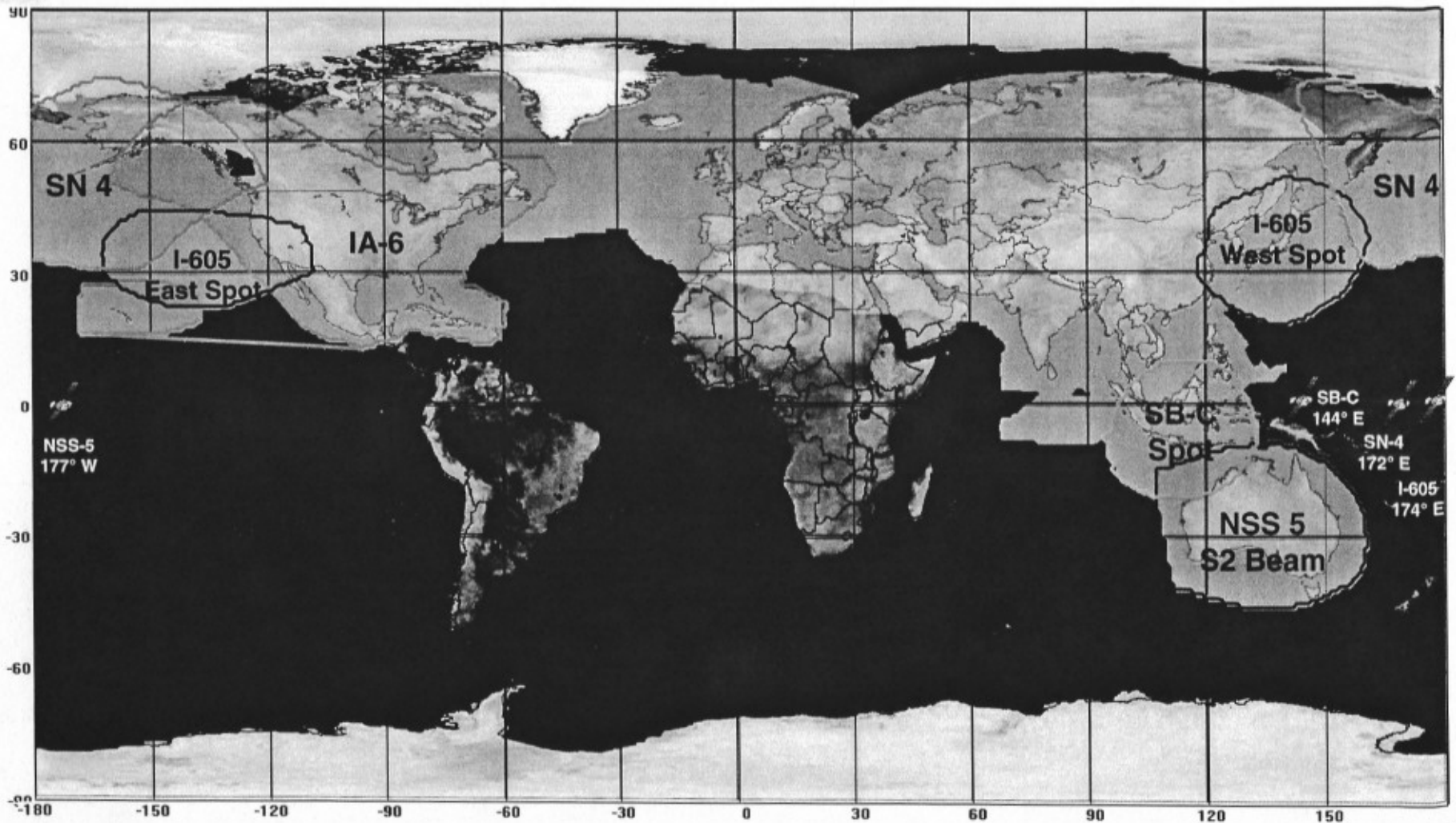
Carlos M. Nalda
Counsel for The Boeing Company

Attachment
cc (w/ att.):

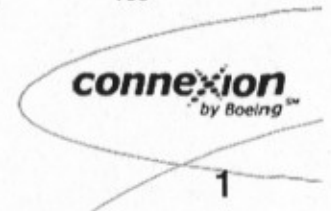
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Interim Pacific Ocean Region Coverage



Coverage to Asian Commercial Airlines (ANA, JAL, KAL, SIA, CHI)



3/31/2005