

DUPLICATE



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March 26, 2009

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

FILED/ACCEPTED
MAR 26 2009
Federal Communications Commission
Office of the Secretary

**Re: Northrop Grumman Space & Mission Systems Corporation,
Surrender of Space Station and Satellite System Authorizations
(File Nos. SAT-LOA-19970904-00080, *et seq.*, Call Signs S2254,
S2255, S2256, S2257, and S2258)**

Dear Ms. Dortch:

Northrop Grumman Space & Mission Systems Corporation, acting through its Aerospace Systems sector (now abbreviated as “NGAS”), hereby surrenders the authorizations the Commission granted it on February 24, 2009 to establish four hybrid Ka-band and V-band fixed-satellite service geostationary orbit space stations and a three-satellite hybrid Ka-band and V-band fixed-satellite service nongeostationary orbit system. *See Northrop Grumman Space & Mission Systems Corporation, Order and Authorization, DA 09-428 (Int’l Bur., released February 24, 2009) (“NGAS Order”).*

The decision to return licenses that include the first-ever commercial V-band satellite authorizations and a unique, integrated, and efficient system design using geostationary (“GSO”) and highly-elliptical orbit (“HEO”) satellites for global service is not one that NGAS makes lightly. Nevertheless, the current economic climate and its impact on all companies large and small have made it imprudent for NGAS to implement such an advanced satellite system while financial and investment markets remain closed.

NGAS is grateful for and appreciative of all of the efforts the Commission and its staff have put into the *NGAS Order* and for the multiple innovations that are contained in that decision. The Commission’s decision is boldly forward looking, and with more licensed bandwidth than any prior grant, represents an expansion of the capabilities and promise of the commercial satellite industry. With its fractional terabit-per-second capability, NGAS’s global system concept was designed to provide VSAT users true fiber-class broadband service at speeds in excess of 100 megabits per second to every country on Earth – from the southern tip of South America to the North Pole.



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NGAS too has put a great deal of effort in getting to this point. It spent many years embroiled in studies and debates both in the U.S. and at the International Telecommunication Union ("ITU") helping to establish stable and flexible technical and regulatory regimes for satellites in both Ka-band and V-band. The technology for low-cost V-band systems was still in the labs at NGAS when these applications were submitted nearly a dozen years ago, and formidable obstacles stood in the way of anyone ever being able to use the V-band FSS allocations for meaningful service. NGAS would not have undertaken such a daunting challenge without envisioning a great reward at the end of the journey. Based on the interest shown by a number of next-generation operators and developers, NGAS is convinced that the industry as a whole will soon cross the threshold of opportunity that V-band spectrum represents for satellite system capacity and throughput, just as it has done at Ka-band. There is no doubt that commercial V-band systems and technology are now practicable, and NGAS is proud to have played a part in helping the Commission bring these new capabilities to the public.

NGAS will do its utmost to ensure that the Commission's vision in developing the *NGAS Order* is realized. The company intends to continue its work with operators and developers that are interested in filing for hybrid V-band/Ka-band, GSO and non-GSO systems when the investment markets recover. NGAS hopes that the hard work done by the Commission staff will enable swift action to be taken on new applications at that point. To that end NGAS encourages the Commission to complete its work on V-band service rules during this industry hiatus.

Please direct any questions you may have regarding NGAS's surrender of its licenses for Call Signs S2254, S2255, S2256, S2257, and S2258 to me.

Respectfully submitted,

Stephen D. Baruch

*Attorney for Northrop Grumman Space &
Mission Systems Corporation*

cc: Mr. John Giusti
Mr. Rod Porter
Ms. Fern Jarmulnek
Mr. Jay Whaley
Mr. Steven Spaeth
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