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October 31, 2005

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By Hand Delivery:

Mr. Scott Kotler
Chief, Systems Analysis Branch
Satellite Division
International Bureau
Federal Communications Commission

**Re: Application of Maritime Telecommunications Network, Inc.,
 File No. SES-AFS-20050805-01081**

Dear Mr. Kotler:

By this letter, Maritime Telecommunications Network, Inc. ("MTN"), by its attorneys, clarifies one aspect of its above-referenced amendment to its application for authority to operate a Ku-band earth station network that includes a Miramar, Florida hub earth station, remote earth stations on-board vessels ("ESVs"), and remote land-based VSAT terminals. Specifically, MTN uses this letter to clarify the meaning of its representation that the ESV antenna controller "can detect within 100 milliseconds if the pointing error should ever exceed 0.5° and cease transmissions immediately." See Amendment at Exhibit E15, "Demonstration of Compliance with Section 25.222 Criteria," at Section 4.

MTN wishes to clarify that its ESV antenna controller can detect and will cease transmissions within 100 milliseconds if the pointing error should ever exceed 0.5 degrees. This is the core requirement of Section 25.222(a)(7) of the Commission's ESV rules. In context, the language of the first paragraph of Section 4 of the relevant exhibit should read as follows:

MTN uses stabilized antenna systems for ESVs that operate with $\pm 0.2^\circ$ pointing accuracy of the exact position of the satellite through which the ESV is communicating. There are only a few exceptional conditions, described below, under which the antenna could be mispointed by more than 0.5°. Even under these highly unusual conditions, the ESV antenna controller can detect and will cease transmissions within 100 milliseconds



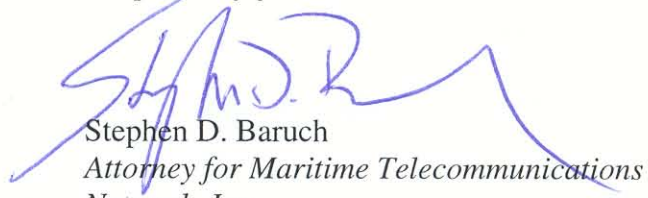
Mr. Scott Kotler
October 31, 2005
Page 2

if the pointing error should ever exceed 0.5° ~~and cease transmissions immediately~~. The controller would then suppress transmissions until the pointing accuracy is within $\pm 0.2^\circ$.

The remainder of the Section 4 of the exhibit in question is unaffected by this clarification.

MTN asks that the Commission take this clarification into account as it considers the above-referenced pending application. Please contact me if you have any questions about this clarification or desire any additional information.

Respectfully yours,



Stephen D. Baruch
*Attorney for Maritime Telecommunications
Network, Inc.*