

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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MAY 22 2006

Federal Communications Commission  
Office of Secretary

Application of: )  
)  
THE BOEING COMPANY ) File Nos. SES-LIC-20060228-00326  
) and SES-AMD-20060324-00507  
For Blanket Authority To Operate Earth )  
Stations Onboard Vessels in the 14.0-14.5 ) Call Sign E060070  
GHz and 11.2-12.75 GHz Bands )

**REPLY OF THE BOEING COMPANY**

The Boeing Company (“Boeing”), by its attorneys, hereby files this Reply in the above-captioned application proceeding. Comments on Boeing’s application were filed by PanAmSat Corporation (“PanAmSat”) on April 21, 2006; and supportive comments on Boeing’s application amendment were filed by ViaSat, Inc. (“ViaSat”) on April 28, 2006. Boeing sought two brief extensions of the reply period in the application proceeding to afford PanAmSat and the operator of the AMC-6 satellite, SES Americom, Inc. (“SES Americom”), time to resolve certain issues raised in PanAmSat’s comments.<sup>1</sup>

Although PanAmSat and SES Americom have made substantial progress and expect to resolve the outstanding issues in the near term, they have not yet come to a final agreement. Rather than seeking additional extensions of time, Boeing is filing this Reply to address the limited issues raised by PanAmSat, and intends to supplement the record of this proceeding under Section 1.65 of the Commission’s Rules when PanAmSat and SES Americom have concluded their discussions.

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<sup>1</sup> See The Boeing Company, Motion for Extension of Time (filed May 1, 2006); The Boeing Company, Motion for Further Extension of Time (filed May 8, 2006).

In its comments, PanAmSat addresses two aspects of Boeing's request to operate in excess of the off-axis e.i.r.p. levels set forth in Section 25.222 of the Rules. First, PanAmSat notes that there is no coordination agreement between PanAmSat and SES Americom that would permit operation at aggregate levels above those in Section 25.222.<sup>2</sup> However, PanAmSat and SES Americom are currently in the process of coordinating Boeing's proposed operations. In its comments, PanAmSat states that if "Boeing is proposing to operate at higher aggregate levels (up to an additional 8 dB) only to the extent that the higher levels have been coordinated with adjacent operators, then PanAmSat has no objection to the proposal."<sup>3</sup> This is indeed Boeing's proposal and Boeing intends to supplement the record of this proceeding once PanAmSat and SES Americom have completed coordination.

Second, PanAmSat notes that there is a coordination agreement between PanAmSat and the operator of the Estrela do Sul satellite which allows for aggregate off-axis e.i.r.p. levels above those of Section 25.222, but below the limits set forth in ITU-R Resolution 902.<sup>4</sup> PanAmSat understands that Boeing's application requests authority to operate at the levels coordinated by PanAmSat and operator of the Estrela do Sul

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<sup>2</sup> See Comments of PanAmSat Corporation (filed April 21, 2006) at 2 ("PanAmSat Comments"). Boeing originally understood from consultations with SES Americom that factors such as geographic limitations on its proposed operations and isolation between the relevant satellite beams obviated the need to coordinate the higher-power operations. The satellite operators have now agreed that coordination would be appropriate in this instance.

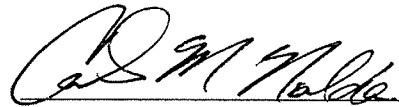
<sup>3</sup> See PanAmSat Comments at 2.

<sup>4</sup> *Id.*

satellite, rather than the Resolution 902 limits.<sup>5</sup> PanAmSat's understanding is correct and Boeing would not object to a license condition making this limitation clear.

Respectfully submitted,

THE BOEING COMPANY

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May 22, 2006

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<sup>5</sup> *Id.* at 3.

**CERTIFICATE OF SERVICE**

I, Carlos Nalda, hereby certify that on this 22nd day of May, 2006 a copy of the foregoing Motion was served via first class mail on the following:

Joe Godles  
Goldberg, Godles, Wiener & Wright  
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Carlos M. Nalda

A handwritten signature in black ink, reading "Carlos M. Nalda", written in a cursive style. The signature is positioned below the printed name and is underlined.