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Federal Communications Commission  
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November 2, 2007

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Scott Kotler  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: SES-MOD-20070220-00260**  
**SES-AMD-20070502-00543**

Dear Mr. Kotler:

This letter amplifies upon the anticipated timing of the launch of SKYLink Aeronautical Mobile Satellite Service North Atlantic coverage and the activities ARINC has undertaken to date in support of its planned new offering.

Since gaining FCC licensing in 2005 (Call Sign E030205), ARINC's SKYLink provides broadband service to AMSS terminals on business and private aircraft. At present, we serve North American airspace via SES Americom AMC-6, in the Ku-band. Starting last year, SKYLink received similar AMSS licenses from much of Europe, enabling SKYLink-equipped aircraft to provide aeronautical broadband in the airspace of 25 European countries via Eutelsat AB-2. And in September, Industry Canada granted ARINC a VSAT license for SKYLink AMSS terminals.

SKYLink customers repeatedly have asked ARINC to extend coverage over the North Atlantic Ocean and so connect existing North American and Northern Europe service areas to provide contiguous uninterrupted service. To secure such authority, ARINC submitted a License Modification Application adding as a point of communications the Loral Skynet Telstar 14 (Estrela do Sul) satellite at 63° W.L. That application proposed to use the identical parameters authorized under the existing domestic service license (power levels not exceeding 1 dB below the permitted envelope).<sup>1</sup> The FCC accepted for filing and placed it on public notice on February 28, 2007; no public comments were filed. Based on the lack of opposition, ARINC set November 1, 2007 as the estimated date for the inauguration of public North Atlantic SKYLink service.

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<sup>1</sup> In 2001, the FCC granted Boeing authorization to operate a similar service in the same region using the same transponders on the same satellite.

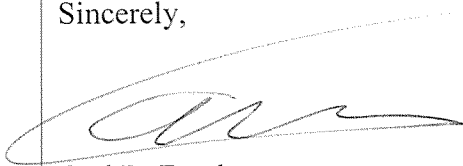
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Since filing the Modification application, ARINC has: 1) developed and deployed the ground infrastructure to support North Atlantic Oceanic service, 2) leased satellite transponders from Loral for North Atlantic Oceanic coverage, and 3) upgraded the airborne earth stations on all aircraft to support seamless roaming between the U.S. and Europe when the license is approved. ARINC's airborne earth station equipment partner, ViaSat, applied for and was granted authorization for a new ground earth station collocated with the existing authorized earth station in Carlsbad, San Diego, California, as detailed in the application SES-LIC-20070125-00142.

When the new service is inaugurated, aircraft will experience a seamless transition between Ku-band satellites when an airborne earth station flies from one coverage footprint to another. The AES also incorporates an automatic transmit inhibit feature that disables the airborne terminal when it travels from an authorized and operational service area to an area without satellite coverage. Alternatively, the software is designed to switch automatically to L-band satellite operation, if the aircraft is so equipped. As of October 15, 2007, ARINC has finalized all hardware, software and system design changes necessary to add North Atlantic SKYLink service.

As of October, 61 SKYLink equipped aircraft have requested roaming service into the North Atlantic Oceanic Region and have requested service begin as soon as possible. Industry expectations have continued to grow with the filing of ARINC's application in April and SKYLink customers are genuinely excited at the prospect of seamless transatlantic operation.

Sincerely,



Carl R. Frank