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May 21, 2008

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Federal Communications Commission
Office of the Secretary

BY MESSENGER

Marlene H. Dortch
Secretary
Federal Communications Commission
445-12th Street SW
Washington, DC 20036

Re: Comtech Mobile Datacom Corporation
Modification of Blanket License to Operate Data Terminals in the L-Band
File No. SES-AMD-20070907-01251, E990143

Dear Ms. Dortch:

Comtech Mobile Datacom Corporation ("CMDC"), by its attorney, submits this letter with the following clarifications and additional information as requested by FCC staff.

First, CMDC confirms that in Exhibit B to FCC Form 312, Schedule B, CMDC is requesting waivers of Section 25.136(d) of the Commission's Rules and footnotes US308 and US315 to the U.S. Table of Frequency Allocations. All of the demonstrations, information, and justifications provided in Exhibit B are provided in support of both an upper L-band waiver (footnote US308, concerning potential interference into AMS(R)S) and a lower L-band waiver (footnote US315 and Section 25.136(d), concerning potential interference into MMSS such as GMDSS). Any suggestion in Exhibit B that the demonstrations, information, and justifications provided therein apply only to a request for waiver of footnote US315 and Section 25.136(d) are unintentional and inadvertent.

Second, CMDC provides the following additional justification for its upper L-band waiver request. CMDC has requested an upper L-band waiver as well as a lower L-band waiver because it needs the ability to operate in both segments of the band in order to compete successfully in the U.S. telecommunications market. It is the satellite operator, not CMDC, who controls the availability and assignment of L-band space segment capacity. CMDC can ask for

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lower L-band capacity when requesting a new channel, but there is no guarantee such capacity will be available for assignment. As such, without a upper L-band waiver, CMDC's inability to obtain a lower L-band channel would likely prevent CMDC from providing a potential client with contracted-for services.

Regardless of the actual availability of lower L-band capacity, restricting CMDC to lower L-band operations could place CMDC at a competitive disadvantage. If a satellite operator is aware of the fact that CMDC's license limits CMDC solely to use of the lower L-band, the operator could use this information as the means to assert a purported scarcity of L-band capacity, and as such justify charging higher rates to CMDC for satellite channels. Furthermore, a competitor who is aware of the restrictions on CMDC's license could use this information to its competitive advantage. If CMDC is limited to providing service only in the lower L-band, the competitor could present a compelling argument that the lesser availability of L-band capacity could prevent CMDC from providing service, or force CMDC to charge higher rates than the competitor, thereby potentially enticing CMDC's existing or prospective customers to purchase service from the competitor rather than from CMDC. CMDC is not aware of any other L-band service provider whose operations have been restricted by the Commission to one band segment despite the operator's request to operate in the entire band.

If you have any questions regarding this matter, please contact the undersigned counsel. Please date-stamp the duplicate copy of this letter and return it to the bearer.

Sincerely,

COMTECH MOBILE DATACOM CORPORATION

By:


Joan M. Griffin
Its Attorney

cc: Scott Kotler