



Federal Communications Commission
Washington, D.C. 20554

August 7, 2008

David S. Keir
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2000 K Street, N.W.
Suite 600
Washington, D.C. 20006

Re: Call Sign E080100
File Nos. SES-LIC-20080508-00570
SES-AMD-20080619-00826
SES-STA-20080711-00928

Dear Mr. Keir:

On May 8, 2008, Row 44, Inc. (Row 44) filed the above-captioned application for a blanket license to operate Aeronautical-Mobile Satellite Service (AMSS) transmit/receive earth stations aboard commercial and private aircrafts.¹ The application was amended on June 19, 2008 to provide supplementary information regarding certifications from satellite operators. The proposed earth stations will operate in the conventional Ku-Band² and access the Horizons 1 satellite at 127° W.L, AMC-9 satellite at 83° W.L., and AMC-1 satellite at 101° W.L. On June 27, 2008, ViaSat, Inc. (ViaSat) filed a petition to deny the above-captioned application. On July 11, 2008, Row 44 filed a request for Special Temporary Authority (STA).³ On July 23, 2008, Row 44 filed an opposition to ViaSat's petition to deny. Pursuant to Section 25.111(a) of the Commission's rules, 47 C.F.R. § 25.111(a), we request that Row 44 provide, by amendment, additional information to allow the Commission to continue to process the application.

Row 44 indicates in its opposition Technical Annex paragraph 1 that its total input power at the antenna flange is never to exceed +12 dBW. Based on the proposed carrier bandwidth of 1.6 MHz, Row 44 asserted that it does not exceed a power density at the input of the antenna flange of -14 dBW/4 kHz. In order to evaluate the application, please provide the Commission with the maximum EIRP (dBW) in any 4 kHz band and the maximum power (dBW) at the input of the antenna flange in any 4 kHz band for any method of modulation or data rate that the proposed system will use.

In Section 4.2.1 of the System Description Exhibit to its application, Row 44 indicates that its system has a pointing error of less than 0.2 degree rms. In order to evaluate the application,

¹ Row 44 requests a blanket authority to operate up to 1,000 technically-identical units.

² Transmit in the 14.05-14.47 GHz and receive in the 11.7-12.2 GHz bands.

³ STA requests for a 60-day period to conduct limited mobility testing of up to 12 aircraft earth station antennas to transmit in the 14.05-14.47 GHz and receive in the 11.7-12.2 GHz bands.

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please provide the Commission the peak mispointing error of the antenna between the orbital location of the target satellite and the axis of the main lobe of the antenna.

Further, Row 44 indicates that it proposes to use a gimbaled motor control to orient the antenna in azimuth, elevation, and polarization. In order to evaluate the application, please provide the Commission technical characteristics that specifies how frequently orientation is assessed and how quickly proper orientation is achieved upon detection that the antenna is not properly oriented. In addition, please provide the Commission graphs that specify the maximum EIRP density (dBW/4kHz) along the geostationary orbit with zero degrees assumed to be the target satellite when the antenna is maximally misoriented in azimuth, elevation, and polarization (that is most interfering) under two potential situations (1) the antenna has zero mispointing with the target satellite and (2) the antenna is maximally mispointed from the target satellite before the antenna receives a cessation of emission command.

In light of the above, we request that Row 44 respond to this letter within 30 calendar days of the date of this letter. Failure to do so may result in the dismissal of the application in its entirety pursuant to Section 25.112(c) of the Commission's rules, 47 C.F.R. § 25.112(c).

Sincerely,



Scott A. Kotler
Chief, Systems Analysis Branch
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cc: John P. Janka
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