

February 3, 2009

Mr. John Giusti
Acting Chief, International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte Presentation*

Call Sign E080100: Applications of Row 44, Inc. for

Authority to Operate up to 1,000 Technically-Identical Aeronautical-Mobile Satellite Service Transmit/Receive Earth Stations Aboard Commercial and Private Aircraft, FCC File Nos. SES-LIC-20080508-00570; SES-AMD-20080619-00826; SES-AMD-20080819-01074; SES-AMD-20080829-01117; SES-AMD-20090115-00041;

Special Temporary Authority, FCC File No. SES-STA-20080711-00928.

Dear Mr. Giusti:

We are writing to propose a mechanism for resolving the outstanding technical issues with respect to the aeronautical-mobile satellite service ("AMSS") system proposed by Row 44, Inc. ("Row 44") in the above-referenced applications. As the Commission is aware, several commenters have questioned Row 44's ability to satisfy the Commission's antenna pointing requirements, and have requested that Row 44 provide data to substantiate the claims in its application that the Row 44 system can operate with a peak pointing accuracy of 0.2 degrees. Satellite operators also have expressed a desire to review operational data from Row 44's system in order to verify its performance claims.

We agree that additional data would clarify the capabilities of Row 44's proposed system and provide an objective basis for the Commission to resolve the outstanding technical issues in this proceeding. Accordingly, we stand ready to work with Row 44 and the Commission to design one or more mutually-acceptable, ground-based tests of the capabilities of Row 44's system. We are willing to make our facilities and other resources available for such tests, which should assist the Commission's evaluation of Row 44's applications, and are ready to proceed expeditiously. Alternatively, the facilities of an independent third party could be used.

We look forward to working with Row 44 and the Commission to implement this proposal. Please contact the undersigned should you have any questions.

Respectfully submitted,

/s/ David Bair

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