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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Application of Panasonic Avionics Corporation; File Nos. SES-LIC-20100805-00992 and SES-AMD-20100914-01163 (Call Sign E100089) - Notice and Clarification

Dear Sir or Madam:

Panasonic Avionics Corporation (“Panasonic”), by its attorneys, hereby notifies the Commission and the other interested party to the above-captioned application proceeding, Row 44, Inc., that in accordance with Section 25.154(e) of the Commission’s rules, 47 C.F.R. §25.154(e), Panasonic will file its response to the Petition of Row 44, Inc. (dated October 15, 2010) or before November 15, 2010.

Panasonic has applied for blanket license authority to operate aircraft earth stations (“AESs”) in the Ku-band aeronautical mobile-satellite service (“AMSS”). Because the Commission has not adopted AMSS licensing and service rules, the only rule provision under which the Commission can potentially grant such authority is Section 25.220, 47 C.F.R. §25.220, entitled “Non-conforming transmit/receive earth station operations.”¹ Other rules provisions are limited by their own terms to earth stations operating in other services (e.g., Section 25.118, entitled “Off-axis EIRP envelopes for FSS earth station operations;” Section 25.222, entitled “Blanket Licensing provisions for Earth Stations on Vessels (ESVs) receiving in the 10.95-11.2 GHz (space-to-Earth), 11.45-11.7 GHz (space-to-Earth), 11.7-12.2 GHz (space-to-Earth) frequency bands and transmitting in the 14.0-14.5 GHz (Earth-to-space) frequency band, operating with Geostationary Orbit (GSO) Satellites in the Fixed-Satellite Service;” and Section 25.226, entitled “Blanket licensing provisions for domestic, U.S. Vehicle-Mounted Earth Stations (VMESs)

¹ See, e.g., Letter from David S. Keir, Counsel to Row 44, Inc., to Marlene H. Dortch dated July 10, 2008 (in File Nos. SES-LIC-20080508-00570 and SES-AMD-20080619-00826); see also Row 44, Inc. Application for Authority to Operate Up to 1,000 Technically Identical Aeronautical Mobile Satellite Service Transmit/Receive Earth Stations Aboard Commercial and Private Aircraft, *Order and Authorization*, DA 09-1752 (Int’l Bur. and OET) at 11, para. 23 (“Even if ...Section 25.220 does not apply to Row 44’s application, we consider it appropriate, as a matter of policy, to use an approach analogous to the one in Section 25.220....”).

receiving in the 10.95-11.2 GHz (space-to-Earth), 11.45-11.7 GHz (space-to-Earth), and 11.7-12.2 GHz (space-to-Earth) frequency bands and transmitting in the 14.0-14.5 GHz (Earth-to-space) frequency band, operating with Geostationary Satellites in the Fixed-Satellite Service;" *see* 47 C.F.R. §§ 25.218, 25.222 and 25.226).

Panasonic cited the above-referenced rules governing other services in the context of providing additional technical information not required by Section 25.220 to further demonstrate that Panasonic's proposed AMSS operations are compliant with the Commission's two-degree spacing policies and will not cause harmful interference to other users of the Ku-band. Such citation by analogy cannot and should not be read to alter the basis for any Commission grant of operating authority to Panasonic. However, for the avoidance of any potential doubt, Panasonic confirms that it is applying for AES operating authority under the only rule provision available to it -- Section 25.220 -- and, as it did in its application filing, as amended, Panasonic will follow the procedural requirements governing applications filed under that provision.

Please feel free to contact the undersigned with any questions regarding this matter.

Respectfully submitted,

PANASONIC AVIONICS CORPORATION



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cc: David S. Keir, Counsel to Row 44, Inc.