



WASHINGTON, DC

DAVID S. KEIR
202.416.6742
DKEIR@LERMANSENTER.COM

February 3, 2010

EX PARTE NOTICE

VIA IBFS

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

Re: Notice of Oral *Ex Parte* Presentation Concerning Applications of Panasonic Avionics Corporation; File Nos. SES-LIC-20100805-00992, SES-AMD-20100914-01163, SES-AMD-20101115-01432 & SES-STA-20110104-00005 (Call Sign E100089)

Dear Ms. Dortch:

On February 2, 2011, in the course of a conversation touching on several other matters, the undersigned counsel for Row 44, Inc. ("Row 44") discussed several issues relating to the above-referenced applications of Panasonic Avionics Corporation for authority to operate an aeronautical mobile-satellite service Earth station network. These proceedings were made subject to permit-but-disclose procedures on January 26, 2011. *See* FCC Report No. SES-01315 at 31 (released January 26, 2011).

In particular, the following points were made: (1) Row 44 intends to file a reply prior to the conclusion of the pleading cycle with respect to the pending PAC STA Request; (2) in Row 44's view, the STA should be dismissed because PAC has failed to articulate any basis, let alone a substantial public interest basis, to operate prior to action on its underlying application; and (3) Row 44's primary objective in this proceeding is to ensure that PAC complies with the same application requirements applicable to all MSS facilities operating in Fixed-Satellite Service bands, so that the International Bureau will have a complete record on which to act.

Respectfully submitted,

s/ David S. Keir
David S. Keir
Counsel to Row 44, Inc.

cc: Carlos M. Nalda, Counsel to PAC
Stephen Duall, FCC (via email)
Paul Blais, FCC (via email)