

Supplemental Statement

Chevron USA Inc. ("Chevron" or "Applicant") respectfully submits this statement in response to the FCC's January 30, 2014 Letter of Inquiry. Chevron proposes to use a Sea Tel 9797, 2.4 meter antenna for its satellite earth station located at the company's Bigfoot Platform in the Gulf of Mexico, coordinates of 26°56'18.0"N, 90°31'24.0" W. The Sea Tel 9797 does not strictly comply with 25.209 of the FCC Rules and Regulations.

Pursuant to the FCC's *Part 25 Earth Station Fifth Report and Order ("Part 25 Order")*,¹ the International Bureau (Bureau) provides a List of Approved Non-Routine Earth Station Antennas. Specifically, these antennas are identified on the website -- <http://www.fcc.gov/ib/sd/nresa>. The website identifies non-routine earth station antennas licensed for use by one or more U.S. earth station operators since March 15, 2005.

In the Part 25 Order, the Commission ruled that an Earth station applicant proposing to use an antenna on the non-routine earth station antenna list may no longer be required to attach antenna radiation plots as an exhibit to their applications, as required by Section 25.132 (b)(3) of the Commission's rules.² Rather, they need only to provide an attachment to the application citing the proposed particular non-routine earth station antenna, and an application file number and call sign of a current license in which that type of non-routine antenna has been previously approved by the FCC.

Accordingly, Chevron submits the prior application of FCC file number File No. SES-LIC-20070216-00237 and Call Sign: E070030, of a licensed SeaTel 9797, 2.4 meter earth station. This station was licensed by the Commission for operation at 30.6dBW/4KHz maximum eirp density. The antenna that Chevron intends to license will operate at 31.24dBW/4KHz maximum eirp density, similar to the cited application referenced above. Therefore, Chevron submits its proposed antenna will operate in a similar manner and without conflict.

Chevron agrees to accept any adjacent satellite interference in the 4 GHz receive band as a result of the performance of the proposed antenna. Additionally, Chevron understands that adjacent satellite interference protection applies only to the extent of the criteria set forth in Section 25.209.³ Should the use of this antenna cause interference to other systems, Chevron agrees to terminate transmission upon notice from the Commission.

Should the FCC have additional questions, it is requested to contact Dawn Damschen, Keller and Heckman LLP, 1001 G Street NW, Suite 500, Washington, DC 20001; phone: 202.434.4239, email: Damschen@khlaw.com.

¹ 2000 Biennial Regulatory Review -- Streamlining and Other Revisions of Part 25 of the Commission's Rules Governing the Licensing of, and Spectrum Usage by, Satellite Network Earth Stations and Space Stations, Fifth Report and Order, IB Docket No. 00-248, 20 FCC Rcd 5666 (2005) (*Part 25 Earth Station Fifth Report and Order*).

² 47 C.F.R. § 25.132 (b)(3).

³ 47 C.F.R. §25.209.