



Federal Communications Commission  
Washington, D.C. 20554

November 5, 2014

Elizabeth Park, Esq.  
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555 Eleventh Street, NW  
Suite 1000  
Washington, D.C. 20004

Re: ISAT US Inc.  
IBFS File Nos. SES-LIC-20140224-00098 and  
SES-AMD-20140715-00601; Call Sign  
E140029

Dear Ms. Park:

This letter requests additional information regarding ISAT US Inc.'s above referenced application for a blanket license to operate earth stations from aboard U.S.-registered maritime vessels, to communicate using the proposed Inmarsat 5F2 space station.<sup>1</sup> ISAT, a subsidiary of Inmarsat Global Ltd., indicates that the earth stations will transmit in the 29.5-30.0 GHz frequency band and receive in the 19.7-20.2 GHz frequency band. To assist the Satellite Division with the processing of this application, we request, pursuant to Section 25.111(a) of the Commission's rules, that ISAT provide the following information:

1. The Form 312 shows that the 2M70G1W emission carrier on the 1-meter antenna (Remote 1) has a maximum EIRP density is 26.5 dBW/4kHz.<sup>2</sup> Staff calculations show the maximum EIRP density should be 25.8 dBW/4kHz. Please confirm or clarify ISAT's calculation in the application.
2. In Exhibit C of ISAT's Application, we note that maximum total input power at antenna flange is 5 watts. Please confirm that the proposed operation is for a single carrier transmission at all times and that there are no multiple carriers engaging in simultaneous transmissions.

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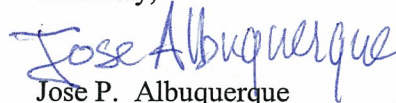
<sup>1</sup> See IBFS File Nos. SES-LIC-20120426-00397 and SES-AMD-20120823-00781, Call Sign: E120072 (request for U.S. market access for the Inmarsat-5F2 spaced station in the 27.5-30.0 GHz band (Earth-to-space) and the 17.7-20.2 GHz (space-to-Earth) frequency bands and request for authority to construct and operate a Fixed Satellite Service (FSS) gateway earth station in Lino Lakes, Minnesota to communicate with Inmarsat's planned Inmarsat-5F2 space station. Inmarsat 5F2 will operate at the 55° W.L. orbital location under the authority of the United Kingdom).

<sup>2</sup> ISAT US Inc., IBFS File No. SES-LIC-20140224-00098, Form 312, Schedule B, Field E49 at 15 (ISAT Application).

In addition, ISAT notes in its application that it will operate similar terminals aboard non-U.S. registered vessels in U.S. territorial waters.<sup>3</sup> To the extent that ISAT also intends to provide services aboard non-U.S. registered vessels in or near U.S. territorial waters, please provide information concerning the frequencies proposed to be utilized. Although the Commission does not license stations on non-U.S. registered maritime vessels, this information will assist in determining compliance with U.S. regulations concerning radiofrequency use.<sup>4</sup> Use of the radiocommunication frequencies in the United States must be in accordance with the Table of Frequency Allocations contained in Section 2.106 of the Commission's rules. We have considered operations similar to those planned by ISAT as requiring a waiver of the Commission's Table of Frequency Allocations and the Ka-band Plan.<sup>5</sup> As a result, ISAT may wish to consider a mechanism for securing a waiver of the Ka-band Plan and U.S. Table of Frequency Allocations, as well as any other applicable operational rules, with respect to operations on non-U.S. registered maritime vessels.

Please submit the requested information within 15 days of the date of this letter. Failure to do so may result in the dismissal of ISAT's application pursuant to Section 25.112(c) of the Commission's rules, 47 C.F.R. § 25.112(c).

Sincerely,



Jose P. Albuquerque  
Chief, Satellite Division  
International Bureau

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<sup>3</sup> ISAT Application, narrative at 1.

<sup>4</sup> See 47 U.S.C. § 306. This section provides that Section 301 of this title shall not apply to any person sending radio communications or signals on a foreign ship while the same is within the jurisdiction of the United States, but such communications or signals shall be transmitted only in accordance with such regulations designed to prevent interference as may be promulgated under the authority of this chapter. See also *United States v. McIntire*, 365 F. Supp. 618, 622 n.11 (D.N.J., 1973) (The Commission has authority to take action against a party broadcasting in violation of its rules, without a license, and whose broadcasts causes interference to Commission-licensed broadcasters, even though the broadcaster was operating from a boat outside U.S. territorial waters).

<sup>5</sup> See e.g., Letter to Ms. Suzanne Malloy, Vice President of Regulatory Affairs, O3b Limited, from Jose P. Albuquerque, Chief, Satellite Division, International Bureau, and Mark Settle, Chief, Policy and Rules Division, Office of Engineering and Technology, Federal Communications Commission, DA 14-1369 (rel. September 22, 2014).