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March 12, 2020

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

**Re: NewCom International Inc. – Section 1.65 Letter Regarding Application to Modify Fixed Earth Station License, File Nos. SES-MOD-20190225-00190 & SES-AMD-20200224-00199 Call Sign E050018**

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Dear Ms. Dortch:

Pursuant to Section 1.65 of the Commission's rules, 47 C.F.R. § 1.65, NewCom International Inc. ("NewCom") hereby updates certain information in connection with the above-referenced applications to modify its fixed earth station license to operate additional earth stations from its teleport facility in Miami, Florida.

First, in reference to the proposed SeaTel 9797B earth station operations, NewCom clarifies that the mid-band transmit gain for the SeaTel 9797B is **41.7 dBi**, as provided in the FCC Form 312 Schedule B. The transmit gain provided in the radiation hazard study is a "worst case" high-band transmit gain value and, practically, NewCom will operate the earth station at all times below the "worst case" level.

Second, NewCom seeks to update certain information in connection with the proposed 2.4m Prodelin earth station. Specifically, NewCom has reexamined the antenna calculations for the 2.4m Prodelin and confirms that the correct EIRP spectral density value associated with the 299 kHz carrier is **26.17 dBW/4 kHz**. Accordingly, NewCom requests that Item E49 of the FCC Form 312 Schedule B be updated to reflect the correct EIRP spectral density value for the Prodelin 2.4m earth station. Moreover, NewCom updates the 2.4m Prodelin Frequency Coordination Report, attached hereto, to confirm that the 299KG7W carrier will utilize a "digital" signal modulation.<sup>1</sup>

No other information in support of this application has changed. Please do not hesitate to contact me with any questions regarding this matter.

Very truly yours,

/s/Richard R. Cameron  
*for NewCom International Inc.*

cc: Paul Blais

Enclosure(s)

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<sup>1</sup> The updated Frequency Coordination Report is also applicable to Speedcast Communications Inc.'s (NewCom's parent) pending STA request for identical 2.4m Prodelin operations. See Speedcast Communications Inc., File No. SES-STA-20200302-00211.

# I. 2.4M Prodelin Coordination Report

## Micronet Communications, Inc.

812 Lexington Dr  
Plano, Texas 75075  
972-422-7200

SUPPLEMENTAL SHOWING PART 101.103(D)

File Number: M2002308 5.93 GHz  
Licensee: Speedcast Communications, Inc.

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Pursuant to Parts 25.203 and 101.103(d) of the FCC Rules and Regulations, a frequency coordination study was conducted by Micronet Communications, Inc. for the following proposed earth station:

Miami Teleport, FL

The results of the study indicate that no unacceptable interference will result with existing, proposed or prior coordinated radio facilities.

Coordination was performed with existing, proposed and prior coordinated carriers within coordination range on the following dates:

01/31/2020 Original PCN (Expedited response requested by 02/14/2020)  
There were no unresolved interference objections.

The attached coordination data was forwarded on the latest date to the following parties within coordination range or their authorized coordination agents:

BROWARD COUNTY BOARD OF COUNTY COMMISSIONERS  
CELLCO PARTNERSHIP  
COLLIER, COUNTY OF  
COMPUTER OFFICE SOLUTIONS, INC.  
COMSEARCH INC  
COUNTY OF MARTIN, FL  
EMBARQ FLORIDA, INC.  
ENTERCOM LICENSE, LLC  
FLORIDA HIGH SPEED INTERNET  
FLORIDA POWER & LIGHT COMPANY  
FLORIDA RSA NO. 2B (INDIAN RIVER) LIMITED PARTNERSHIP  
FLORIDA RURAL BROADBAND ALLIANCE, LLC  
FLORIDA, STATE OF  
HIQ DATA CORP  
MIAMI-DADE COUNTY  
MICRONET COMMUNICATIONS INC  
NEW CINGULAR WIRELESS PCS, LLC  
OLYMPIC WIRELESS  
PALM BEACH COUNTY OF  
PALM BEACH, COUNTY OF  
RADIO DYNAMICS  
SCHOOL DISTRICT OF PALM BEACH COUNTY  
SOUTH FLORIDA WATER MANAGEMENT DISTRICT  
SPRINT SPECTRUM L.P.  
ST. LUCIE COUNTY PUBLIC SAFETY  
T-MOBILE LICENSE LLC  
WIRELESS APPLICATIONS CORP

**Micronet Communications, Inc.**

812 Lexington Dr  
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Respectfully Submitted,



Jeremy Lewis  
Systems Engineer

Attached: 1 data sheet

Micronet Communications, Inc.  
 812 Lexington Dr  
 Plano, Texas 75075  
 972-422-7200

File: M2002308

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TECHNICAL CHARACTERISTICS OF TRANSMIT ONLY EARTH STATION

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Company:	Speedcast Communications, Inc.		
Site Name, State:	Miami Teleport, FL		
Call Sign:			
Latitude	(NAD83)	25 54	59.3 N
Longitude	(NAD83)	80 13	29.2 W
Elevation AMSL	(ft/m)	1.00	0.30
Receive Frequency Range	(MHz)		
Transmit Frequency Range	(MHz)	5925-5930.2/6167.925-6182.065/6419.965-6425	
Range of Satellite Orbital Long.	(deg W)	114.00	115.00
Range of Azimuths from North	(deg)	236.84	237.81
Antenna Centerline	(ft/m)	52.49	16.00
Antenna Elevation Angles	(deg)	41.94	41.10

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Equipment Parameters	Transmit	
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Antenna Gain, Main Beam	(dbI)	42.00
15 DB Half Beamwidth	(deg)	3.20
Antennas	Transmit: PRODELIN 1251	
Max Transmitter Power	(dbW/4KHz)	-3.96
Max EIRP Main Beam	(dbW/4KHz)	38.04
Modulation / Emission Designator	DIGITAL 299KG7W	

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Coordination Parameters	Transmit	
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Max Greater Circle Distances	(km)	162.01
Max Rain Scatter Distances	(km)	100.00
Max Interference Power Long Term	(dbW)	-154.80
Max Interference Power Short Term	(dbW)	-126.80
Rain Zone / Radio Zone		1 A