

Federal Communications Commission Washington, D.C. 20554

March 31, 2004

Raul Rodriguez, Esq. Leventhal, Senter & Lerman, PLLC 2000 K Street, N.W. Suite 600 Washington, D.C. 20006 Telephone: 202-429-8970

Re:

Maritime Telecommunications Network Application, File No. SES-LIC-2001113-002259, Call Sign: E010332

Dear Mr. Rodriguez:

The Satellite Division is currently reviewing Maritime Telecommunications Network's ("MTN") application for authority to operate earth stations on vessels utilizing the Ku band. As part of the application process and pursuant to a request by the Federal Communications Commission, MTN served adjacent satellite operators with an interference analysis. As explained below, we have identified certain discrepancies between the information contained in MTN's application and the interference analysis served on adjacent operators.

On January 16, 2004 and again on February 23, 2004, MTN served on adjacent operators and the Commission an interference analysis. ¹ Upon review, we noted that the antenna described in the application is materially different from, and more likely to cause interference than, the antenna described in the interference analysis served on operators of adjacent satellites. ² Additionally, the input power density contained in the application appears to be near the value of -14dBW/4KHz listed in section 25.212(c) of the Commission's rules as a limit. In contrast, the input power density contained in the interference analysis served on adjacent operators is closer to -17dBW/4KHz. The presence of such discrepancies may indicate that MTN intends to deploy a system that varies from the system described in its application.

Accordingly, MTN is directed to respond to this letter and explain the discrepancies identified above by April 12, 2004. MTN's response should indicate whether MTN intends to amend its application and/or serve a revised interference analysis upon the operators of adjacent satellites. In either event, MTN should file any such amendment or revised interference analysis with the Commission and, if

¹ The Bureau listed both MTN's January 16 original notice and the February 23 corrected notice to adjacent operators in a Public Notice. See Public Notice, Satellite Communications Services, Re: Satellite Radio Applications Accepted for Filing, Report No. SES-00570 (rel. Jan. 21, 2004); Public Notice, Satellite Communications Services, Re: Satellite Radio Applications Accepted for Filing, Report No. SES-00586 (rel. March 17, 2004).

² The antenna diameter in the application is 2.4 meters and the diameter listed in the interference analysis is 1.35x 1.20 meters.

appropriate serve the same on operators of adjacent satellites, on the same date as its responsive letter.³ If MTN fails to respond to this letter by April 12, 2004, MTN's application may be dismissed pursuant to sections 25.112(c) and 25.152(b) of the Commission's rules.⁴ If you have any questions, you may contact me at 202 418 2343.

Sincerely,

William Howden

Chief, Systems Analysis Branch

Satellite Division

cc: Robert Hanson, Vice President — Regulatory Affairs

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John Forsey
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³ If MTN serves a revised interference analysis upon operators of adjacent satellites, the operators would have 30 days from the receipt of such revised interference analysis to file comments or objections with the Commission. Any such revised interference analysis should specifically notify operators of adjacent satellites of the period within which to file comments or objections.

⁴ See also Amendment of the Commission's Space Station Licensing Rules and Policies (First Report and Order), FCC 03-102, 18 FCC Rcd 10760 at ¶244 (2003).