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

**Re: Maritime Telecommunications Network Application
File No. SES-LIC-20011130-02259; Call Sign E010332**

Dear Ms. Dortch:

I am writing to you on behalf of Maritime Telecommunications Network, Inc. ("MTN"), in response to Mr. Howden's letter of March 31, 2004 concerning the referenced application, and consistent with our recent telephone conversations with Mr. Howden regarding this matter. The letter requested that MTN explain the "discrepancies" between the application as originally filed in November 2001 and the interference analysis filed with adjacent satellite operators and copied to this application file on January 16, 2004 and on February 23, 2004.

MTN agrees that certain earth station characteristics have changed since the filing of the application. Advances in technology now allow MTN to provide the same level of service using a smaller antenna. Accordingly, MTN has changed its system configuration with resulting efficiency gains in transmission bandwidth and power. The net result is that even though the antenna system has some notable differences (e.g., the reflector diameter has been reduced from 2.4 m to 1.2 m), the transmit spectral density is approximately 8 dbW/4KHz less than the previous system and, therefore, the potential for interference is also considerably less. For these reasons, the change should be considered a minor modification and not require a major amendment. Please see the attachment to this letter that compares several technical characteristics between the 2001 application and more recent developments.

MTN is prepared to amend its application, but respectfully requests that the modification be considered "minor," and thus avoid the amended application's being placed on public notice. Please consider that the original application was filed in 2001, and as recently as only two months ago, MTN served all possibly affected adjacent satellite operators with detailed interference analysis, and that no party has an objection pending with respect to the application's "modified" technical characteristics. In the interest of conserving Commission resources and the



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reasonably expeditious processing of pending applications, we urge the Commission to permit MTN to file a "minor" modification to reflect changes in technology and its business plan since 2001, and not to require a major modification with the resulting further delay in the processing of this application. If the Commission does not concur in this request, MTN is prepared to file whatever amendment is deemed appropriate.

In furtherance of this request, and to avoid any possible doubt, MTN reiterates the commitments it filed with the Commission in this proceeding with respect to points of communication, muting, notice to adjacent satellite operators, 24-hours point-of-contact and acknowledgment of subjectivity to the pending rule making on ESV operations. MTN hereby incorporates by reference its letter of January 16, 2004 filed in this proceeding concerning the commitments enumerated in this paragraph.

Please contact MTN's undersigned counsel with any questions or concerns with respect to this letter or the underlying earth station application.

Respectfully submitted,

Raul R. Rodriguez
Counsel to Maritime Telecommunications Network, Inc.

RRR/rjc
Attachment

cc: Mr. Bill Howden

Attachment

The following table demonstrates the differences between the transmit characteristics of the original 2.4 m system and the new 1.2 m system.

Comparison	New	Original
Input Power (Watts)	7.06	14.1
Data Rate (Kbits/s)	384	384
Occupied Bandwidth (KHz)	349.19	349.19
Transmit power (dBW)	8.49	11.49
Reference BW Correction Factor (dBW/4KHz)	19.41	19.41
Transmit power/BW (dBW/4KHz)	-10.92	-7.92
Feeder loss (dB)	6	6
TX Power at antenna input (dBW/4KHz)	-16.92	-13.92
Antenna main beam gain (dBi)	42.55	47.50
Transmit e.i.r.p. density (dBW/4KHz)	25.63	33.58