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RECEIVED

OCT 28 2004

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

Federal Communications Commission  
Office of Secretary

Re: **Maritime Telecommunications Network Application**  
**File No. SES-LIC-2001113002259; Call Sign E010332**

Dear Ms. Dortch:

In response to staff inquiry, Maritime Telecommunications Network, Inc. ("MTN"), through counsel, provides updated information relevant to the referenced application.

Pursuant to a grant of special temporary authorization, MTN is currently using the SATMEX-5 satellite to provide Ku-band ESV services along the Florida coastline and on cruises of short duration off the West Coast of the United States. MTN's current plans include expansion of this service to cruise ships going between ports in the Hawaiian Islands sometime in 2005, using the Intelsat IA7 satellite. Before MTN commences the latter service, it will need to apply for and obtain a modification of its Ku-band authorization that is the subject of the referenced application.

MTN is also considering business opportunities that would expand Ku-band service in the Gulf of Mexico in 2005. As envisioned today, this new service would involve short-range vessels that would not take them sufficiently close to the Mexican border (i.e., less than 100 kilometers) so as to require a bilateral agreement. Nonetheless, if and when such agreement is warranted, MTN would assist the United States in obtaining an agreement with another administration.

With respect to another issue related to the referenced application, in the context of a pending rulemaking proceeding in IB Docket No. 02-10, the National Telecommunications and Information Administration ("NTIA") has suggested that Ku-band ESVs not be allowed to operate in the entire 14.0-14.2 GHz band. In its comments in IB Docket No. 02-10, MTN has made clear its intention to protect legitimate U.S. government users and to coordinate with NTIA its ESVs that operate in this segment of the Ku-band. MTN also noted in a letter dated



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November 22, 2002 filed in the instant proceeding, that U.S. Government operations in this band are limited to receive-only services in the 14.0-14.05 GHz band. Therefore, for reasons of spectrum efficiency and because of MTN's commitment to coordinate with NTIA when operating in this band, there is no legitimate reason for restricting the operation of ESVs from the entire 14.0-14.2 GHz band.

Please contact undersigned counsel with any questions or concerns regarding the matters raised in this letter.

Respectfully submitted,

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

RRR/rjc

cc (by e-mail): Mr. Tom Tycz  
Mr. Karl Kensinger  
Mr. Bill Howden