



Federal Communications Commission
Washington, DC 20554

International Bureau

July 26, 2005

Raul R. Rodriguez
Leventhal Senter & Lerman PLLC
2000 K Street, N.W., Suite 600
Washington, DC 20006

Re: Call Sign: E010332
SES-LIC-20011130-02259
SES-AMD-20040518-00680
SES-AMD-20040812-01173

Dear Mr. Rodriguez:

On November 30, 2001, Maritime Telecommunications Network Inc. (MTN) filed the above-captioned application, and amended it on May 18 and August 12, 2004. For the reasons stated below, we request MTN to amend the subject application.

MTN seeks authority to operate a VSAT network on the Fixed-Satellite Service 11.7-12.2 GHz and 14.0-14.5 GHz Ku-band spectrum. The VSAT network consists of up to ten earth stations on board U.S.-flagged ships at any location in U.S.- and adjacent waters, including when stationary at piers. We note that MTN's proposed use of the 14.0-14.2 GHz band, which is shared with the Government space research service, has been successfully coordinated through NTIA. MTN also provided information in response to a Systems Analysis Branch inquiry.

On December 15, 2004, the Commission adopted a number of new rules applicable to the type of operations contemplated under MTN's application, known as the operation of Earth Stations on Vessels (ESVs).¹ The substantive requirements of these rules took effect on March 2, 2005 and June 15, 2005.² Specifically, we request that MTN demonstrate compliance, pursuant to Section 25.222 of the Commission's rules, with the following Ku-band ESV requirements:

- Ku-band ESV operators must meet an off-axis EIRP spectral density envelope as

¹ Procedures to Govern the Use of Satellite Earth Stations on Board Vessels in the 5925-6425 MHz/3700-4200 MHz Bands and 14.0-14.5 GHz/11.7-12.2 GHz Bands, *Report and Order*, IB Docket No. 02-10, FCC 04-286, 20 FCC Rcd 674 (2005).

² See 70 F.R. 4775 (Jan. 31, 2005) and 70 F.R. 34665 (June 15, 2005).

described in 47 C.F.R. § 25.222(a)(1) through (5). Therefore, we request a demonstration as required by 47 C.F.R. § 25.222(b)(1), (2), or (3).

- All emissions from the ESV shall automatically cease within 100 milliseconds if the angle between the orbital location of the target satellite and the axis of the main lobe of the ESV antenna exceeds 0.5 degrees, and transmission will not resume until such angle is less than 0.2 degrees (*see* 47 C.F.R. § 25.222(a)(7)). We request that MTN demonstrate how the proposed operation will comply with this requirement.

Further action on the subject application will be withheld in order to provide MTN an opportunity to respond to this letter. MTN is required to respond, by amendment to the subject application, by August 10, 2005. Failure to do so will cause the Commission to promptly dismiss the application without prejudice pursuant to Section 25.112(c) of the rules. *See* 47 C.F.R. § 25.112(c).

Sincerely,

A handwritten signature in black ink that reads "Scott A. Kotler". The signature is written in a cursive style with a large initial 'S'.

Scott A. Kotler
Chief, Systems Analysis Branch
Satellite Division