



International Bureau

Federal Communications Commission  
Washington, DC 20554

July 26, 2005

Dennis Selby  
BJ Services Company, U.S.A.  
5500 Northwest Central Drive  
Houston, TX 77092

Re: Call Sign: E020083  
File No. SES-LIC-20020326-00479

Dear Mr. Selby:

On March 26, 2002, BJ Services Company (BJS) filed the above-captioned application. For the reasons stated below, we request BJS to amend the subject application.

BJS 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 a hub station located at Tomball, and remote terminals in multiple ships operating in the Gulf of Mexico. We note that BJS'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. BJS 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 BJS's application, known as the operation of Earth Stations on Vessels (ESVs).<sup>1</sup> The substantive requirements of these rules took effect on March 2, 2005 and June 15, 2005.<sup>2</sup> Specifically, we request that BJS 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 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).

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<sup>1</sup> 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 Red 674 (2005).

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

- 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 BJS demonstrate how the proposed operation will comply with this requirement.

Further action on the subject application will be withheld in order to provide BJS an opportunity to respond to this letter. BJS 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 cursive script that reads "Scott A. Kotler".

Scott A. Kotler  
Chief, Systems Analysis Branch  
Satellite Division

CC: Brian Mitchell, Esq.