



Federal Communications Commission
Washington, DC 20554

International Bureau

July 26, 2005

Michelle A. McClure
Irwin, Campbell & Tannenwald, P.C.
1730 Rhode Island Avenue, N.W., Suite 200
Washington, DC 20036-0354

Re: Call Sign: E020160
File No. SES-LIC-20020611-00939

Dear Ms. McClure:

On June 11, 2002, L3 Communications IEC (L3) filed the above-captioned application. For the reasons stated below, we request L3 to amend the subject application.

L3 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 mobile hub station onboard a U.S. naval ship operating in U.S.- and adjacent waters, and remote terminals in various military base locations throughout the United States. We note that L3'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. L3 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 L3'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 L3 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).

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).

- 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 L3 demonstrate how the proposed operation will comply with this requirement.

In addition, we advise that, pursuant to Section 25.116, major amendments to a pending application, such as the supplemental changes requested by L3 on January 27, 2005, are to be filed electronically through the International Bureau Filing System (IBFS) and are subject to the public notice requirements.

Further action on the subject application will be withheld in order to provide L3 an opportunity to respond to this letter. L3 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, stylized 'S' and 'K'.

Scott A. Kotler
Chief, Systems Analysis Branch
Satellite Division