

DEC 6 RECD

December 1, 2004

Ms. Marlene Dortch, Secretary
Federal Communications Commission
The Portals Building
445 12th Street, SW
TW-A325
Washington, D.C. 20554

Satellite and
Radiocommunications Division
International Bureau

RECEIVED

DEC - 1 2004

Federal Communications Commission
Office of Secretary

Re: L3 Communications, Interstate Electronics Corporation (IEC)
Application for Earth Station Authority
File No.: SES-LIC-20020611-00939
Call Sign: E020160

Dear Ms. Dortch

PanAmSat Corporation ("PanAmSat") received from L3 Communications, Interstate Electronics Corporation (IEC) ("IEC"), a letter, dated November 1, 2004, , together with information pertaining to the above referenced application. IEC states that we should reply directly to the FCC on this matter and that the lack of a reply "within thirty calendar days from the date of this notice" would be construed "as an assent to the grant of IEC's earth station application".

In similar situations, an affidavit is generally the result of an understanding between the operators of the satellites involved (in this case PanAmSat and Intelsat). However, so far we have not been contacted by Intelsat with respect to this matter.

In particular, PanAmSat is concerned with the following specific points:

- (i) IEC states "that the ESVs will operate with a $\pm 0.2^\circ$ pointing accuracy" and then goes on to say that "the operator will terminate ESV transmission when the antenna goes beyond $\pm 0.5^\circ$ ". These statements lead to the understanding that the pointing accuracy is actually $\pm 0.5^\circ$ and the matter needs clarification.
- (ii) According to the ESV link parameters provided by IEC, it is concluded that the input power density to the antenna may exceed by more than 5 dB the

value set in 47C.F.R. §25.212(c). This fact combined with the pointing accuracy problems discussed in (i) above raise concerns about the potential for interference to PanAmSat uplinks.

- (iii) IEC provides a brief description of the antenna system stabilization but PanAmSat would like to know more details about the capabilities of such stabilization system.

In view of the points discussed above, PanAmSat is concerned about the potential for interference from IEC earth stations to PanAmSat satellites at 95° W and 99° W and, in the absence of further clarifications and possible adjustments in the application, is not in a position to agree with the grant of such application.

Respectfully submitted,



Jose Albuquerque
Senior Director, Regulatory Engineering
PanAmSat
1801 K Street, NW Suite 440
Washington, D.C. 20006
Phone: 202 2924309
e-mail: jalbuquerque@panamsat.com

cc: Tom Murphy, IEC
Michelle A. McClure, Esq., Irwin, Campbell & Tannenwald, P.C.