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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

OCT 1 4 2004

Federal Communication Commission Bureau/Office

In the Matter of	
SCHLUMBERGER OMNES, INC.	
Application for Authority to Operate a Ku-band Mobile VSAT Network	

File No. SES-LIC-20021028-0196

To: Chief, International Bureau

MOTION FOR LEAVE TO FILE LATE

On October 25, 2002, the above-referenced FCC Form 312 application was filed to operate a Ku-band mobile VSAT network on vessels traveling along U.S. inland waterway systems (the "Application"). A Petition for Waiver of the Table of Allocations ("Petition") to permit <u>mobile</u> operation of this VSAT system on frequencies assigned for <u>fixed</u> use was filed with the Application.

The International Bureau ("Bureau") requested additional information concerning the Application. On August 30, 2004, the Bureau granted Schlumberger Omnes, Inc. ("SOI") until September 29, 2004, to file its responses to the Bureau's request for information. These responses were filed with the Commission on October 8, 2004, as an amendment (a copy of which is attached hereto).

A Motion for Leave to File Late ("Motion") inadvertently was not included with this amendment. Good cause exists for grant of this Motion and acceptance of the filed amendment. First, SOI was dependent on obtaining affidavits from

several third parties and worked diligently to get those affidavits completed. SOI promptly filed the affidavits once they were received. Second, this Application has been pending for almost two (2) years. Grant of the Application and the Petition clearly are in the public interest. SOI's proposed mobile VSAT technology would enable: (i) barge operators to operate, on an interference-free basis by replacing conventional, bridge-to-bridge VHF radios with their state-of-the-art а telecommunications network; (ii) support the President's Homeland Security initiatives; and (iii) support U.S. Coast Guard and Army Corps efforts to improve safe barge traffic and early severe weather detection on the Inland Waterway Moreover, there was no interference caused by the mobile VSAT when system. SOI was operating under STA. Third, no other party protested grant of the Application or Petition and thus no other party would be prejudiced by grant of this Motion.

For the foregoing reasons, SOI requests that the Bureau grant this Motion and accept its late-filed amendment.

Respectfully submitted.

SCHLUMBERGER QMNES, INC.

Robert J. Miller

Gardere Wynne Sewell LLP 1601 Elm Street. Suite 3000 Dallas, Texas 75201-4761 (214) 999-4219

Its Attorney

October 13, 2004

DALLAS 1457549v1

Schlumberger

South Houston Teleport 7265 Old Galveston Road Houston, Texas 77034

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AMENDMENT

Schlumberger Omnes, Inc. Call Sign: E020303 File No. SES-LIC-20021028-01926

The above-referenced application is hereby amended to include the attached requested declarations from adjacent satellite operators affected within six degrees of the points of communication (SES Americom Inc., Intelsat Global Services, and PanAmSat Corporation), attesting that each such operator is aware of and acknowledges the applicant's proposed operation in the Ku Band, and does not object to that operation.

Lennor

Michael D. Lennon Teleport Operations Manager

Dated:October 7, 2004



September 21, 2004

Federal Communications Commission – International Bureau 445 12th Street, S.W. Washington, D.C. 20554

Subject: Engineering Certification of SES Americom

To whom it may concern:

This letter certifies that SES Americom Inc. ("SES") is aware of the application pending with the Federal Communications Commission ("FCC") to grant Schlumberger Omnes, Inc. ("SOI") (FCC File No. SES-LIC-20021028-01926) (the "Application") authority to operate a Ku-band fixed VSAT network serving earth stations on vessels ("ESVs") along the U.S. Inland Waterway system.

SOI is seeking FCC authorization to utilize the FCC-licensed SES satellite AMC-4 at 101 degrees W.L. SES has provided Intelsat Global Services with a list of SES transponders currently assigned to support transmissions from these antennas. For purposes of inter-system coordination, SES promptly will provide Intelsat Global Services with relevant information for any additional or different transponders provided by SES.

SOI proposes to use the Spacetrack Ku-band terminal with a 1.2 meter circular aperture antenna. SES understands that this antenna complies with the requirements of Section 25.209 of the FCC's rules. This antenna will maintain a nominal pointing accuracy of +/-0.2 degrees and will be operated at a maximum input power density at the antenna waveguide flange of -18 dBW/4 kHz, which satisfies the -14.0 dBW/4 kHz FCC maximum for 2-degree compliant systems and routine licensing.¹ Transmission will be inhibited upon loss of receiver lock or at pointing offset larger than 0.2 degrees from the intended satellite.

¹ 47 CFR § 25.134

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SES and SOI each acknowledges that these antennas will be installed in compliance with the technical, operational and performance requirements in Part 25 of the FCC's rules and in compliance with all requirements set forth in SOI's FCC licenses. The above antennas will be installed by a professional installer and aligned with the intended satellite to less than or equal to the tolerance parameters set forth in this letter.

The undersigned further certifies that the maximum downlink satellite EIRP density of 6.0 dBW/4KHz for SOI's Ku-band VSAT network is within the levels coordinated with Intelsat Global Services.

SES acknowledges that SOI's use of its ESV antenna system, installed and operated in accordance with the above conditions, should not cause unacceptable interference into adjacent satellites. SES further acknowledges that SOI will accept interference from adjacent satellites to the degree harmful interference would not be expected to be caused to an earth station employing an antenna conforming to the reference patterns defined in Section 25.209 of the FCC's rules. If the use of this antenna should cause interference into other systems, SOI has agreed that it will terminate transmissions immediately upon notice from the affected parties.

Furthermore, should other satellites be positioned at the aforementioned orbital locations, the transponder assignments coordinated pursuant to this letter will remain the same.

Sincerely,

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Jaime Londono Satellite Market Development, Director SES Americom

September 21, 2004 Page 3 of 3

Acceptance by Schlumberger Omnes Inc.:

Schlumberger Omnes testifies that the information provided to SES Americom and reflected in this Affidavit letter is true and accurate to the best of Schlumberger Omnes' knowledge.

Michael D Lennon Lee Russell, P.E. MICHAEL D LENNON

Lee Russell, P.E. MICHAEL D LENNOR Operations Manager Schlumberger Omnes, Inc.

Acceptance by Intelsat Global Services:

Intelsat Global Services agrees to the use of the Spacetrack Ku-band terminal with an aperture of 1.2 meter, with their respective azimuth angle alignment tolerances toward AMC-4 and the power density levels into the antenna flange as stated in this letter, with respect to Intelsat satellite transponders that are within +/- 6 degrees orbital spacing from AMC-4 at 101 degrees W.L.

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Ram Manohar Department Manager, Frequency Management Intelsat

An SES GLOBAL Company

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September 21, 2004

Federal Communications Commission – International Bureau 445 12th Street, S.W. Washington, D.C. 20554

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SOI is seeking FCC authorization to utilize the FCC-licensed SES satellite AMC-4 at 101 degrees W.L. SES has provided PanAmSat with a list of SES transponders currently assigned to support transmissions from these antennas. For purposes of inter-system coordination, SES promptly will provide PanAmSat with relevant information for any additional or different transponders provided by SES.

SOI proposes to use the Spacetrack Ku-band terminal with a 1.2 meter circular aperture antenna. SES understands that this antenna complies with the requirements of Section 25.209 of the FCC's rules. This antenna will maintain a nominal pointing accuracy of +/-0.2 degrees and will be operated at a maximum input power density at the antenna waveguide flange of -18 dBW/4 kHz, which satisfies the -14.0 dBW/4 kHz FCC maximum for 2-degree compliant systems and routine licensing.¹ Transmission will be inhibited upon loss of receiver lock or at pointing offset larger than 0.2 degrees from the intended satellite.

SES and SOI each acknowledges that these antennas will be installed in compliance with the technical, operational and performance requirements in Part

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September 21, 2004 Page 2 of 3

25 of the FCC's rules and in compliance with all requirements set forth in SOI's FCC licenses. The above antennas will be installed by a professional installer and aligned with the intended satellite to less than or equal to the tolerance parameters set forth in this letter.

The undersigned further certifies that the maximum downlink satellite EIRP density of 6.0 dBW/4KHz for SOI's Ku-band VSAT network is within the levels coordinated with PanAmSat.

SES acknowledges that SOI's use of its ESV antenna system, installed and operated in accordance with the above conditions, should not cause unacceptable interference into adjacent satellites. SES further acknowledges that SOI will accept interference from adjacent satellites to the degree harmful interference would not be expected to be caused to an earth station employing an antenna conforming to the reference patterns defined in Section 25.209 of the FCC's rules. If the use of this antenna should cause interference into other systems, SOI has agreed that it will terminate transmissions immediately upon notice from the affected parties.

Furthermore, should other satellites be positioned at the aforementioned orbital locations, the transponder assignments coordinated pursuant to this letter will remain the same.

Sincerely,

Jaime Londono Satellite Market Development, Director SES Americom

September 21, 2004 Page 3 of 3

Acceptance by Schlumberger Omnes Inc.:

Schlumberger Omnes testifies that the information provided to SES Americom and reflected in this Affidavit letter is true and accurate to the best of Schlumberger Omnes' knowledge.

Loo Russell, P.E. MICHAEL DLENNON

Operations Manager Schlumberger Omnes, Inc.

Acceptance by PanAmSat:

PanAmSat agrees to the use of the Spacetrack KU-band terminal with an aperture of 1.2 meter, with their respective azimuth angle alignment tolerances toward AMC-4 and the power density levels into the antenna flange as stated in this letter, with respect to Galaxy satellite transponders that are within +/- 6 degrees orbital spacing from AMC-4 at 101 degrees W.L..

Mohammad Marashi

Vice President Customer Support Engineering PanAmSat Corporation