FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

September 3, 2004

Robert G. Allen, P.C.
9300 Forest Point Circle
P.O. Box 2126
Manassas, VA 20108

Re: Telco214, Inc. ("Telco214")
File Nos: SES-LIC-20040528-00747
SES-LIC-20040528-00748
SES-LIC-20040528-00749

Dear Mr. Allen:

Upon review of the above-captioned applications to request authority to operate a fixed earth station located in Melbourne, Florida we find inconsistencies in the data provided for points of communication, and we find that particulars of operation do not qualify for routine authorization. We require that you provide the following information within 20 calendar days of the date of this letter, or the applications will be dismissed.

1. Intelsat 511, 603, and 605, requested as Points of Communication by Telco214, are not at the locations specified in the application. Specifically, Intelsat 511 is no longer operational, Intelsat 603 is currently located at 340 E.L. not at 335.5 E.L., and Intelsat 605 is at 33 E.L not at 332.5 E.L. Consequently, we are not able to determine the satellites with which Telco214 seeks to communicate. If Telco214 refiles, it must accurately identify the satellites with which it seeks to communicate, the orbit locations at which they are operating or are authorized if not yet launched, and the frequency bands in which operations to and from each satellite will occur.

2. For application SESLIC2004052800747, the EIRP density of 56.8 dBW/4KHz entered for the emissions 2M46G7W and 205KG7W in Item E49 of Schedule B, with gain of 56.8 for the antenna, results in an input power density of 0.0 dBW/4KHz, which exceeds the criteria for routine authorization for digital signals for the proposed transmit band 5925 to 6425 MHz. For application SESLIC2004052800748, the EIRP density of 53.9 dBW/4KHz entered for the emissions 2M46G7W and 205KG7W in Item E49 of Schedule B, with gain of 53.9 for the antenna, results in an input power density of 0.0 dBW/4KHz which exceeds the criteria for routine authorization. Also, the emission 2M46G7W shows an eirp of 81.8 dBW, which is greater than possible with the stated maximum input power of 200 watts, or 23.01 dBw, and gain of 53.9. For application SESLIC2004052800749, the EIRP density

of 53.9 dBW/4KHz entered for the emissions 2M46G7W and 205KG7W in Item E49 of Schedule B, with gain of 53.5 for the antenna, results in an input power density of 0.4 dBW/4KHz, which exceeds the criteria for routine authorization. To allow us to continue with review of these applications, you will need to either (1) amend the values for eirp density or other variables to values that meet criteria for routine authorization; or (2) provide date in the form of charts or tables that clearly show that the off axis eirp resulting from the values presently proposed is less than or equal to the off axis eirp that would result from an operation conforming to our criteria for routine authorization, or (3) obtain affidavits from operators of satellites adjacent to the points of communication for your proposed operation stating that those operators are aware of the particulars of the proposed operation and have no objection. In any case, you will need to insure that all data provided is consistent.

3. We also note that for the frequency bands listed, 3700 to 4200 MHz for the downlink and 5925 to 6425 MHz for the uplink, ALSAT would include Satmex 5, Solaridad 2, and all Intelsat satellites, and that, if the values for eirp and eirp density result in power density conforming to our criteria for routine authorization, then ALSAT is permissible for points of communication, but not otherwise.

Sincerely,

William Howden

William Howden
Chief
System Analysis Branch
Satellite Division
International Bureau

cc: Telco214, Inc.
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