

TELCO 214, INC.
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September 22, 2004

William Howden
Chief
System Analysis Branch
Federal Communications Commission
Satellite Division
International Bureau
445 12th Street, Southwest
Washington, DC 20554

Re: Responses to Your 9/3/04 Letter
Telco 214, Inc.
SES-LIC-20040528-00747
SES-LIC-20040528-00748
SES-LIC-20040528-00749

Dear Mr. Howden:

The following information is being submitted in response to your September 3, 2004 letter with respect to the three above-referenced pending satellite earth station applications. For ease of reference, your comments are included in the order in which they appeared in your letter, followed by our responses which include corrected and clarified information.

First FCC Staff Comment:

Intelsat 511, 603 and 605 requested as Points of Communications by Telco 214 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 s at 33 E.L., not at 332.5 E.L. Consequently, we are not able to determine the satellites with which Telcon 214 seeks to communicate. If Telco 214 re-files, it must accurately identify the satellites with which it seeks to communicate, the orbit location 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.

Telco 214 Response:

Telco 214 clarifies that in its intended bands of operation (3700 to 4200 MHz for the downlink and 5925 to 6425 MHz for the uplink) ALSAT operation, if the applications are approved by the Commission for routine authorization, would automatically be inclusive of all Intelsat satellites within the approved arcs of the respective antennas. It is such operation that Telco 214 requests. Intelsat 511 is no longer operational and therefore is not being requested as a point of communication. Further, Telco 214 clarifies that it does *not* intend to utilize Intelsat 603. Rather, it intends to communicate with Intelsat 905 (located at 335.5 E.L.). Neither does Telco 214 intend to use Intelsat 605. To summarize: In view of the fact that Telco 214 is herein modifying its three subject applications to qualify for routine processing, ALSAT operation will include all reachable Intelsat satellites. Accordingly, ALSAT operation is respectfully requested for all Intelsat satellites within the requested operational arcs of the Telco 214 earth stations as well as all other satellites licensable under the ALSAT designation and located within the proposed operational arcs of the three subject applications.

Second FCC Staff Comment:

For application SES-LIC-20040528-00747 [Universal 13 Meter], the EIRP density of 56.8 dBW/4KHz entered into 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 SES-LIC-20040528-00748 [Andrew 9.1]**, 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 SES-LIC-20040528-00749 [Vertex 9.0]**, the EIRP density of 53.9 dBW/4KHz entered into 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 data in the form of charts or tables that clearly show that 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.

Telco 214 Response:

Telco 214 hereby modifies its previously stated values for eirp density or other variables to values that meet criteria for routine authorization, as follows:

Application SES-LIC-20040528-00747 (Universal 13 Meter):

<u>DATA POINT</u>	<u>PREVIOUSLY STATED VALUE</u>	<u>MODIFIED VALUE</u>
E-38	500 Watts (Total Input Power)	16.5 Watts (Total Input Power)
E-40	83.8 All Carrier EIRP	69.0 All Carrier EIRP
E-48 (205KG7W)	67.8 Max EIRP Per Carrier	51.4 Max EIRP Per Carrier
E-49 (205KG7W)	56.8 EIRP Density Per Carrier	34.3 EIRP Density Per Carrier
E-48 (2M46G7W)	83.8 Max EIRP Per Carrier	62.2 Max EIRP Per Carrier
E-49 (2M46G7W)	56.8 EIRP Density Per Carrier	34.3 EIRP Density Per Carrier
E-60 (downlink)	0.0 Max EIRP Dens/Horizon	38.4 Max EIRP Dens/Horizon
E-60 (uplink)	-4.1 Max EIRP Dens/Horizon	38.4 Max EIRP Dens/Horizon

Application SES-LIC-20040528-00748 (Andrew 9.1 Meter):

<u>DATA POINT</u>	<u>PREVIOUSLY STATED VALUE</u>	<u>MODIFIED VALUE</u>
E-38	200 Watts (Total Input Power)	47.0 Watts (Total Input Power)
E-40	81.8 All Carrier EIRP	70.7 All Carrier EIRP
E-41/42 (downlink)	50.1 dBi at 4 GHz	50.5 dBi at 4 GHz
E-48 (205KG7W)	64.9 Max EIRP Per Carrier	53.0 Max EIRP Per Carrier
E-49 (205KG7W)	52.9 EIRP Density Per Carrier	35.9 EIRP Density Per Carrier
E-48 (2M46G7W)	81.8 Max EIRP Per Carrier	63.7 Max EIRP Per Carrier
E-49 (2M46G7W)	53.9 EIRP Density Per Carrier	35.9 EIRP Density Per Carrier
E-60 (downlink)	4.1 Max EIRP Dens/Horizon	39.8 Max EIRP Dens/Horizon
E-60 (uplink)	4.1 Max EIRP Dens/Horizon	39.8 Max EIRP Dens/Horizon

Application SES-LIC-20040528-00749 (Vertex 9.0 Meter):

<u>DATA POINT</u>	<u>PREVIOUSLY STATED VALUE</u>	<u>MODIFIED VALUE</u>
E32	9.1 Meter	9.0 Meter
E-38	500 Watts (Total Input Power)	47.0 Watts (Total Input Power)
E-40	81.8 All Carrier EIRP	70.7 All Carrier EIRP
E-41/42 (downlink)	64.9 dBi at 4 GHz	50.1 dBi at 4 GHz
E-48 (205KG7W)	64.9 Max EIRP Per Carrier	52.8 Max EIRP Per Carrier
E-49 (205KG7W)	53.9 EIRP Density Per Carrier	35.7 EIRP Density Per Carrier
E-48 (2M46G7W)	81.8 Max EIRP Per Carrier	63.5 Max EIRP Per Carrier
E-49 (2M46G7W)	53.9 EIRP Density Per Carrier	35.7 EIRP Density Per Carrier
E-60 (downlink)	4.1 Max EIRP Dens/Horizon	39.8 Max EIRP Dens/Horizon
E-60 (uplink)	4.1 Max EIRP Dens/Horizon	39.8 Max EIRP Dens/Horizon

Third FCC Staff Comment:

We also note that for the frequency bands listed, 3700 to 4200 MHz for the downlink and 5935 to 6425 MHz for the uplink, ALSAT would include Satmex 5, Solidaridad 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 communications, but not otherwise.

Telco 214 Response:

The foregoing Telco 214 clarifications result in the three subject applications being subject to routine authorization. For that reason, ALSAT authority is respectfully sought.

If you have any questions, please feel free to contact us.

Very truly yours,

/s/

Jose Martinez

Engineering Operations