NON-COMPLIANT ANTENNA STATEMENT

December 9, 2005

Federal Communications Commission
The Portals
445 Twelfth Street, SW
Washington, DC 20554

RE: Shell Offshore, Inc.
C-Band Transmit/Receive Earth Station
Oil Platform
Shell Mars Flotila (Mississippi Canyon 807), Gulf of Mexico

Dear Sirs:

The antenna pattern contained with this application, exceeds the CFR 25.209 sidelobe specification for the sidelobe envelope in the ±1° to 1.9° region by a maximum of 9.0 dB, at 6 GHz. Outside the main beam, the antenna generally meets the requirements of 25.209.

The maximum RF power density normally licensed by the Federal Communications Commission for smaller diameter antennas, utilizing C-band digital traffic, is -2.7 dBW/4 kHz. This license application is being filed by Shell Offshore, Inc., to operate with a RF transmit power density of –17.7 dBW/4 kHz.

A review of the antenna pattern envelopes for the Sea Tel 2.4 meter antenna (included as Exhibit F) indicates that the antenna exceeds the CFR 25.209 sidelobe specifications by 9.0 dB at 6 GHz. A comparison of the FCC's maximum authorized RF transmit power density (-2.7 dBW/4 kHz) and the actual transmit power density of the proposed earth station (-17.7 dBW/4 kHz), indicates that the applied for transmit power density is 15.0 dB lower than the specified power restrictions. When the Sea Tel 2.4 meter antenna pattern envelopes are considered, the applied for transmit power density is still 6.0 dB, less than the maximum RF power density normally licensed by the FCC. This reduced RF transmit power will result in acceptable performance for the antenna, with respect to adjacent satellite interference.

It is the intention of Shell Offshore, Inc., to operate with the PAS-1R (45 degrees W.L.) satellite. The low transmit should allow for operations without adjacent satellite interference with other satellites.

The applicant agrees to accept any adjacent satellite interference in the 4 GHz receive band as a result of the performance of the antenna. The applicant understands that adjacent satellite interference protection applies only to the extent of the criteria set forth in §25.209.

If the use of this antenna should cause interference into other systems, Shell Offshore, Inc. will terminate transmissions immediately upon notice from the FCC offended parties.

Sincerely,

Shell Offshore, Inc.

Don Happel