



Federal Communications Commission
Washington, D.C. 20554

January 29, 2007

Joseph A. Godles, Esq.
Goldberg Godles Wiener & Wright
1229 19th Street, N.W.
Washington, DC 20036-2413

Re: Call Sign: E060430
File No.: SES-LIC-20061206-02100
File No.: SES-AMD-20061214-02179

Dear Mr. Godles:

On December 6, 2006, TerreStar Networks, Inc. (TerreStar) filed the above-captioned application, as amended, seeking authority to operate up to 2 million portable handset mobile earth terminals (METs) in the 2 GHz band¹ that will communicate with the Canadian satellite, TerreStar-1. In order to facilitate processing of the application, we request additional information.

The MET application requests authority consistent with a spectrum reservation issued to TMI Communications and Co., Limited Partnership, in response to its Letter of Intent filing ("LOI").² We also note that certain information provided in the MET application concerning TerreStar-1 and the related network appears to have changed since the Commission decided to reserve spectrum for the satellite system. In particular, we note the following:

- 1) In response to item E46 of Schedule B in its MET application, TerreStar indicates that the polarization of the antenna is horizontal. However, in Section 5 of Attachment 2 (Engineering Exhibit) of its LOI application,³ TMI stated that the polarization would be right hand circular for both service bands.
- 2) In response to item E47 of Schedule B, in its MET application, TerreStar indicates that the emission designators are 1M25G7W, 26K0G7W, 6K50G7W, 313KG7W, 31K3G7W, 156KG7W, 200KG7W, and 50K0G7W.

¹ 2180.0-2200.0 MHz and 2000-2020 MHz.

² See TMI Communications and Company, Limited Partnership, Letter of Intent to Provide Mobile-Satellite Service in the 2 GHz Bands, Order, DA 01-1638, 16 FCC Rcd 13808 (Int'l Bur. 2001) (TMI Authorization), TMI Communications and Company, Limited Partnership, Memorandum Opinion and Order, 18 FCC Rcd 1725 (Int'l Bur. 2003) ("TMI Milestone Order"), TMI Communications and Company, Limited Partnership and TerreStar Networks Inc., FCC 04-144 (June 29, 2004), and Use of Returned Spectrum in the 2 GHz Mobile Satellite Service Frequency Bands, 20 FCC Rcd 19696, 19726 (2005) ("2x10 MHz Order").

³ See TMI Communications and Company, Limited Partnership application, File No. SAT-LOI-19970926-00161.

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However, in Section 5 of Attachment 2 of its LOI,⁴ TMI stated that the emission designator is 5K00G1W.

- 3) In File No. SES-AMD-20061214-02179, TerreStar indicates that Terrestar-1 will be located at the 111.1° W.L. orbital location, rather than at the 107.3° W.L. orbital location specified in the spectrum reservation.

TerreStar indicates that information concerning the Terrestar-1 satellite has already been provided, and that it intends to seek modification of its spectrum reservation to address these matters. However, we believe the filing of a full Schedule S for the Terrestar-1 satellite would facilitate processing of the MET application. Accordingly, please submit an amendment including a full Schedule S for the Terrestar-1 satellite. Please include in the Schedule S information concerning all frequency bands on which the satellite will be capable of operating.

We also note two additional matters that you may wish to address in any amendment. First, in response to question E17 of Schedule B, TerreStar indicated that the METs will not be controlled remotely. While this method of operation is permitted for METs, we note that Section 25.271 of the Commission's rules requires that, unless remotely controlled, such METs must be under the direct control of a trained operator at the site from which it operates. This method of operation may not be practical for a large number of METs. We also note that in Exhibit 3 of the application, TerreStar states that it will have the ability to shut down its mobile earth terminals 24 hours a day, seven days a week, from its network operations center. We therefore seek clarification of whether, in fact, TerreStar intends to remotely control its METs. If so, TerreStar should answer "yes" to question E17 and provide a response to questions E61 through E68 of Schedule B. Second, in response to items E54 and E55 of Schedule B, TerreStar provides a range of satellite arc for the Terrestar-1 satellite. The listing of a range is appropriate only for ALSAT designated earth stations. Accordingly, please correct items E54 and E55 to reflect the intended orbital location of the satellite.

TerreStar should submit the requested information within thirty calendar days from the date of this letter. Failure to submit the requested information will result in dismissal of the application.

Sincerely,



Scott A. Kotler
Chief, Systems Analysis Branch
Satellite Division
International Bureau

⁴ See TMI Communications and Company, Limited Partnership application, File No. SAT-LOI-19970926-00161.