



July 24, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: File No. SES-LIC-20070504-00563

Dear Ms. Dortch:

Maritime Telecommunications Network, Inc. ("MTN") respectfully submits the following comments in connection with the above-referenced application of SES Americom, Inc. ("SES Americom") for authority to operate a Ku-band network of terminals providing earth station on vessels ("ESV") services. In its application, SES Americom requests waiver of the antenna pointing accuracy requirements contained in Sections 25.222(6) and (7) of the Commission's rules. SeaTel, Inc. ("SeaTel") opposes the waiver request.

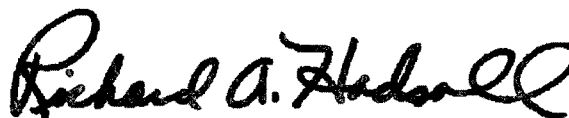
MTN is a leading provider of maritime telecommunications services via satellite and is itself the holder of Ku- and C-band ESV authorizations. MTN worked closely with the Commission to craft a regulatory framework for ESV operations that culminated in the ESV rules adopted more than two years ago, and thus is thoroughly familiar with the intent and purpose of those rules. Given the opposing points of view concerning the ESV rules presented by SES Americom and SeaTel, MTN offers these observations in the interest of clarifying the issues raised.

MTN believes that SES Americom's waiver request is based on a faulty premise – namely, that satisfaction of the off-axis e.i.r.p.-density limits contained in the ESV rules necessarily equates to satisfaction of, or somehow negates the need for, the ESV pointing accuracy requirements. That is not the case because, as SeaTel states in its comments, the two requirements are not interchangeable. Off-axis e.i.r.p.-density limits are intended to permit operations consistent with the Commission's two-degree spacing policy by restricting the power density emitted in directions other than towards the earth station's target satellite. The pointing accuracy requirements, in contrast, protect adjacent satellite operations by limiting the degree of allowable antenna drift, and then requiring automatic shutdown in the event of excessive mispointing. Given the differing means of achieving interference protection offered by the two rules, satisfaction of one (the off-axis e.i.r.p. density limits in the case of SES Americom) does not mean satisfaction of the other (pointing accuracy, for which SES Americom seeks a waiver). Indeed, if the two rules were as redundant as SES Americom suggests, there would have been no reason to adopt both rules in the first place.

Even if the Commission believes that SES Americom's waiver request has technical merit, MTN agrees with SeaTel that consideration of that request should be deferred until completion of the Vehicle-Mounted Earth Stations ("VMES") rule making proceeding. SES Americom proposes an exception to the pointing accuracy requirements applicable to VMES that is identical to the relief that it seeks with the ESV waiver request.¹ MTN believes that it would be unwise to grant the waiver request in advance of the VMES proceeding, however, because it would establish a precedent that may ultimately be unsupported by the record compiled in that proceeding, and in effect place "the cart before the horse." The better approach, in MTN's view, is to wait until interested parties have had the opportunity to comment on SES Americom's proposal, and for the Commission to fully consider and address those comments.

For all of these reasons, MTN urges the Commission to defer consideration of SES Americom's waiver request until completion of the VMES rule making proceeding.

Respectfully submitted,



Richard A. Hadsall
Senior Vice President
Maritime Telecommunications Network, Inc.

¹ VMES Notice of Proposed Rule Making at ¶ 52.

CERTIFICATE OF SERVICE

I, Richard A. Hadsall, hereby certify that a true and correct copy of the foregoing letter from Maritime Telecommunications Network, Inc. was sent by first-class, postage prepaid mail, this 24th day of July, 2007, to the following:

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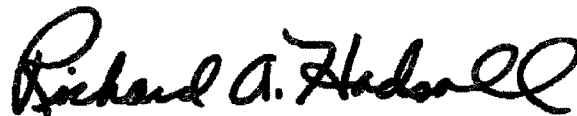
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