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# LATHAM & WATKINS LLP

November 17, 2014

## **VIA ELECTRONIC FILING IN IBFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

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Re: ISAT US, Inc., Response to Request for Additional Information  
IBFS File No. SES-LIC-20140224-00098 (“Application”); SES-AMD-  
20140715-00601 (“Amendment”); Call Sign E140029

Dear Ms. Dortch:

In response to the Commission’s request letter dated November 5, 2014, ISAT US, Inc. (“ISAT US”) supplements the above-referenced Application and Amendment for a blanket license to operate earth stations on maritime vessels to provide the additional information requested. ISAT US provides the following responses to the numbered requests:

- 1. The Form 312 shows that the 2M70G1W emission carrier on the 1-meter antenna (Remote 1) has a maximum EIRP density of 26.5 dBW/4kHz. Staff calculations show the maximum EIRP density should be 25.8 dBW/4kHz. Please confirm or clarify ISAT’s calculation in the application.*

The emission designator should instead have been listed as 2M30G1W, which results in a maximum EIRP density of 26.5 dBW/4kHz for the referenced antenna. ISAT US is filing an amended Form 312 Schedule B to reflect this change to the emission designator.

- 2. In Exhibit C of ISAT’s Application, we note that maximum total input power at antenna flange is 5 watts. Please confirm that the proposed operation is for a single carrier transmission at all times and that there are no multiple carriers engaging in simultaneous transmissions.*

ISAT US confirms that the proposed operations of the antenna are for single-carrier transmissions.

In response to the Commission's inquiry about Inmarsat's planned operation of earth stations on foreign-registered maritime vessels in U.S. territorial waters, ISAT US clarifies as follows

- (i) Such earth stations will operate in U.S. territorial waters using the 19.7-20.2 GHz and 29.5-30.0 GHz bands.
- (ii) Such earth stations will be operated within the same network, under the same operational control, under the same technical parameters, and otherwise subject to the same conditions designed to ensure non-interfering operations with the FSS as the proposed earth stations that would be U.S.-licensed and operated on U.S.-registered maritime vessels.
- (iii) Inmarsat will maintain control over the operation of these earth stations of foreign-registered vessels while in U.S. territorial waters in the same manner as it will control the earth stations operated on U.S.-flagged ships.

Inmarsat recognizes that transmissions from a foreign-flagged ship "while the same is within the jurisdiction of the United States" are required to be "in accordance with such regulations designed to prevent interference as may be promulgated under the authority of this Act."<sup>1</sup> Inmarsat also recognizes that the Commission previously has considered such earth station operations in other parts of the Ka band on foreign-registered maritime vessels located in U.S. territorial waters as requiring a waiver of the U.S. Table of Frequency Allocations and the Commission's Ka-band plan. As detailed in the Application, Inmarsat has sought such a waiver, to the extent necessary, with respect to the operation of the proposed earth stations on U.S.-registered vessels. To the extent necessary, ISAT US clarifies that it seeks a waiver of the U.S. Table of Frequency Allocations and the Commission's Ka-band plan to operate the proposed earth stations regardless whether they are located on U.S.-registered vessels, or instead are located on foreign-flagged ships in U.S. territorial waters.<sup>2</sup> As demonstrated in the Application and Amendment and as detailed above, the terminals are capable of operating at 19.7-20.2 GHz and 29.5-30.0 GHz without causing harmful interference to FSS operations in those band segments. Inmarsat submits that such a waiver would serve the public interest for the reasons already provided in the Application.

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<sup>1</sup> 47 U.S.C. § 306.

<sup>2</sup> See Application, Exhibit A at 4-6 (discussing U.S. frequency allocations and requesting a waiver for terminals operating on U.S.-registered vessels to the extent necessary).

LATHAM & WATKINS<sup>LLP</sup>

If you have any questions regarding this submission, please feel free to contact the undersigned.

Respectfully submitted,

/s/

John P. Janka  
Elizabeth R. Park

cc: Jose Albuquerque