



Federal Communications Commission  
Washington, D.C. 20554

DA 16-1156

October 7, 2016

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Call Sign: E160144  
File No.: SES-LIC-20160826-00747  
SES-STA-20160826-00748

Dear Mr. Liberman:

On August 26, 2016, MTN License Corp. (MTN) filed the above-captioned applications seeking earth station license authority to operate with Permitted List satellites in the 13.75-14.50 GHz (Earth-to-space) and 11.70-12.20 GHz (space-to-Earth) frequency bands. Pursuant to Section 25.112(a)(1) of the Commission's rules, 47 C.F.R. § 25.112(a)(1), we dismiss the applications without prejudice to re-filing.<sup>1</sup>

Section 25.112(a) of the Commission's rules, 47 C.F.R. § 25.112(a), requires the Commission to return as unacceptable for filing any earth station application that is not substantially complete, contains internal inconsistencies, or does not substantially comply with the Commission's rules. For the reasons stated below, MTN's application is inconsistent, does not comply with the Commission's rules, and is subject to dismissal.

1. Section 25.115(k)(1) of the Commission's rules, 47 C.F.R. § 25.115(k)(1), allows operations with Permitted Space Station List in the 13.75-14.50 GHz frequency band. However, Section 25.130(b) of the Commission's rules, 47 C.F.R. § 25.130(b), requires an applicant to file a coordination analysis in bands shared equally with other services. MTN failed to provide an adequate frequency coordination analysis.<sup>2</sup>
2. In Item E49 of Schedule B, MTN listed 58.8 dBW/4kHz as the maximum EIRP density per carrier. Based on the maximum 85.78 dBW EIRP per carrier listed in Item E48 of Schedule B and the 36 MHz bandwidth listed in Item E47 Emission Designators

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<sup>1</sup> If MTN refiles an application in which the deficiencies identified in this letter have been corrected but is otherwise identical to the one dismissed, it need not pay an application fee. *See* 47 C.F.R. § 1.1111(d).

<sup>2</sup> For an example of an adequate frequency coordination analysis, *see* Exhibit A of IBFS File No. SES-LIC-20141124-00872.

36M0G7D and 36M0G7W, our calculations show that the values in Item E49 should be 46.23 dBW/4kHz, not 58.8 dBW/4kHz.<sup>3</sup>

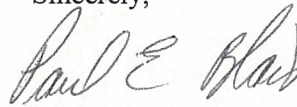
3. The maximum EIRP Density per Carrier exceeds the 71dBW/6MHz (39.20 dBW/4kHz) limit set in Footnote US357 of Section 2.106 of the Commission's rules, 47 C.F.R. § 2.106, for the 13.77-13.78 GHz band.

Though not a reason for dismissal, we request that MTN provide the following additional information if it refiles these applications.

1. A demonstration how the antenna radiation hazard analysis results were calculated.<sup>4</sup>
2. A manufacturer's certification of compliance to the Section 25.209 antenna performance limits.<sup>5</sup>

Accordingly, pursuant to Section 25.112(a)(1) of the Commission's rules, 47 C.F.R. §25.112(a)(1), and Section 0.261 of the Commission's rules, 47 C.F.R. §0.261, we dismiss the application without prejudice to re-filing.

Sincerely,



Paul E. Blais  
Chief, Systems Analysis Branch  
Satellite Division  
International Bureau

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<sup>3</sup>  $85.78 + 10 \cdot \log(4 \cdot 10^3 / 36 \cdot 10^6) = 46.23$  [dBW/4kHz].

<sup>4</sup> See OET Bulletin No. 65 (August 1997) at <https://www.fcc.gov/general/oet-bulletins-line#block-menu-block-4>.

<sup>5</sup> See 47 C.F.R. § 25.132 (a)(1).