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June 15, 2009

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445-12<sup>th</sup> Street NW.  
Washington, D.C. 20554

Re: *In the Matter of Comtech Mobile Datacom Corporation Application for Modification of Blanket Earth Station Authorization:*  
**Comtech Mobile Datacom Corporation Request for Clarification**  
(File Nos. SES-MFS-20070530-00731, SES-AMD-20070731-01010  
SES-AMD-20070907-01251; Call Sign: E990143)

Dear Ms. Dortch:

Comtech Mobile Datacom Corporation (“Comtech” or the “Company”), by its attorneys, respectfully requests that the Commission clarify ordering clause 8(b) in its recent order granting Comtech’s application for modification of its blanket earth station authority.<sup>1</sup>

On May 15, 2009, the Commission issued an order, granting Comtech’s request for modification of its existing earth station authority to include expanded operations, new types of terminals and, significantly for this filing, addition of the MSAT-2 satellite as a new point of communications (in addition to the previously authorized MSAT-1 satellite). The first line of paragraph 8(b) in that order states that “Comtech Mobile Datacom Corporation’s authorization as

<sup>1</sup> *In the Matter of Comtech Mobile Datacom Corporation Application for Modification of Blanket Earth Station Authorization*, ORDER AND AUTHORIZATION, DA-09-906 (Rel. May 15, 2009).

modified is limited *to a term ending January 18, 2011, or until either the MSAT-1 or MSAT-2 satellite ceases operation.*<sup>2</sup> Comtech has two concerns regarding this provision and requests clarification from the Commission as described below.

First, Comtech believes that the Commission intended the just-referenced statement in paragraph 8(b) to mean that the authorization terminates upon the earlier of these events. No other reading of this sentence seems reasonable; however, it is not indisputably clear as written. Therefore, Comtech requests that the Commission clarify that the authorization, as modified, is limited to a term ending with the earlier of the determinative events.

Second, Comtech is concerned about the impact of the Commission's requirement that the authorization terminate if "either the MSAT-1 or MSAT-2 satellite ceases operation."<sup>3</sup> It is not clear to Comtech why, in the event one of the two MSAT satellites ceases operation prior to January 18, 2011, the Company's authorization to operate on the other MSAT satellite must terminate, since Comtech is not required by its authorization to operate its MET network on both satellites. Should MSAT-1 or MSAT-2 cease operation prior to January 18, 2011, an obvious option for Comtech would be to put all of its traffic onto the remaining MSAT satellite. Terminating Comtech's authorization for the remaining spacecraft in the event MSAT-1 or MSAT-2 ceases operation creates unnecessary administrative costs for the FCC and Comtech in this instance, as it requires Comtech to file and the Commission to process a request for an STA and an application for new authority to operate on the remaining MSAT satellite, despite the fact that the Commission has already reviewed and approved Comtech's operation on this spacecraft. To avoid these unnecessary costs for both the FCC and Comtech, Comtech respectfully requests

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<sup>2</sup> *Id.* at ¶8(b) (emphasis added).

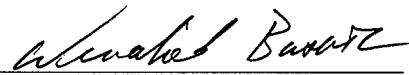
<sup>3</sup> *Id.* (emphasis added).

that the Commission clarify paragraph 8(b) to confirm that the Company's authorization, as modified, continues until January 18, 2011 or until both MSAT satellites cease operation.

Please direct any questions as to this matter to the undersigned counsel.

Respectfully submitted,

Comtech Mobile Datacom Corporation



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