

August 25, 2009

Kathryn Medley
System Analysis Branch
Satellite Division, International Bureau
Federal Communications Commission
445 12th Street SW, Washington, DC 20554

Re: Modification of ESV License – Additional information

CapRock Communications, Inc. (“CapRock”) wishes to include the following additional information to application SES-MFS-20090811-00988 (E060157) to modify its existing Earth Stations on Vessels (ESV) license. The modification requests, to add a 9m Vertex extended Ku-band antenna operated by Telesat Network Services, Inc. (“Telesat”) as an additional hub to CapRock’s network (see diagram on Exhibit A). CapRock states that:

- CapRock wishes to use Telesat’s satellites only on the range of frequencies requested by CapRock. This is pursuant to an agreement between CapRock and Telesat whereby CapRock is solely responsible for operation and management of these frequencies.
- CapRock, and not Telesat, will be the network operator and will be entirely responsible for compliance with all Federal Communications Commission’s (“Commission”) requirements contained in Sections 25.222 and 25.271 of the regulations. This is to include: providing 24X7 call center coverage, ESV location data collection and retention, and automatic shutdown of the ESVs. Furthermore, CapRock will be the only party capable of managing the network with appropriate authority to terminate transmissions if and when the Commission requests to do so.
- CapRock seeks to add Telesat’s 9m antenna to CapRock’s ESV network because CapRock does not currently have an antenna available that is capable of accessing Telstar 11N in the extended Ku-band (satellite operated by Telesat). Using Telesat’s 9m antenna will eliminate the need to construct a new CapRock antenna, thereby reducing the administrative burden on the Commission and the NTIA. In other words, granting of the application at issue will eliminate the need to go through coordination requirements with the two agencies. The 9m Telesat antenna is already coordinated. Consequently, CapRock will operate within the technical parameters that Telesat has already coordinated.
- CapRock understands that if CapRock were to cease providing service over Telesat’s 9m antenna, it will relinquish control of the frequencies and turn them back to Telesat for assignment to another one of Telesat’s customers.

Sincerely,

/s/ Raul Magallanes
Raul Magallanes, Counsel to CapRock

Exhibit A Network Diagram

