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June 23, 2008

Mr. Scott Kotler, Chief - Systems Analysis Branch, Satellite Division
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: ARINC Incorporated
License Modification Application
File Number: SES-MOD-20080521-00669
Call Sign: E030205
Date of License: 04/06/2005

Dear Mr. Kotler:

With respect to the modification filing referenced above, Ms. Trang Nguyen sent an e-mail to William Kolb (ARINC Contact) dated June 04, 2008, 2:09 PM, with a request for clarification. The intent of this letter is to provide that clarification.

The Application seeks to add one additional Point of Communication, SES/New Skies satellite NSS-7, to provide coverage of the Caribbean Ocean Region with broadband communications services to and from its authorized AMSS AESs.

The pending Modification Application was incomplete as filed electronically. On the FCC 312 Form, Schedule B, we failed to complete E28 through E49 for the second mode of transmission, 28M8G7D, as authorized in the current License. The omitted information should read as follows:

E28. Antenna ID **1000009**;
E43/44. Frequency Bands **14000 14500**;
E45. **T**;
E46. Antenna Polarization **Horizontal and Vertical**;
E47. Emission Designator **28M8G7D**;
E48. Maximum EIRP per Carrier (dBW) **33.79**;
E49. Maximum EIRP Density per Carrier (dBW/4 kHz) **-4.78**.

Note that these entries are identical to those in the current authorized License. There is no change in E50: Modulation and Services OQPSK, Direct Spread Spectrum with GMSK shaping and a data rate of 128 kbps.

The second point of clarification addresses the EIRP Density Level of the NSS-7 downlink to the AMSS terminals over the Caribbean region. The EIRP Density Level remains unchanged from that



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which exists in the continental U.S. and is controlled by the same earth station system in Carlsbad, San Diego, California, that has maintained interference-free service of the ARINC SKYLinkSM system since authorization. We do not anticipate requesting a waiver of Commission Rules to operate in this Region. ARINC continues to abide by the non-interference agreements it has with NASA and the NSF.

The third point of clarification was in regard to the operating relationship between the added NSS-7 and the existing AMC-6 satellite earth stations. As mentioned above, the controlling earth station is the same for both. They are networked so that the same safety provisions apply. The Carlsbad earth station will control the NSS-7 transponder that communicates with each AMSS earth station in the Caribbean Region. It is worthy of note that SES Americom owns both the AMC-6 and NSS-7 operations, providing a single contact to ensure rapid response in the event of suspected interference or a shut-down request from the Federal Government in the event of a national emergency.

If you have further questions concerning this filing, please don't hesitate to contact me for clarification. It is our desire to satisfy our customers with coverage of the Caribbean Ocean Region as soon as possible.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W. Kolb', is written in a cursive style.

William M. Kolb
Director, Satellite Services
Aviation Solutions

410-266-4017

CC: Eleanor M. Lott, Trang Nguyen