



Federal Communications Commission
Washington, D.C. 20554

DA 08-2644

December 3, 2008

Carlos Nalda
Squire, Sanders & Dempsey L.L.P.
1201 Pennsylvania Avenue, N.W.
Suite 500
Washington, DC 20004

Re: File No. SES-MOD-20080818-01067 (Call Sign E060447)
File No. SES-MOD-20080818-01068 (Call Sign E060448)
File No. SES-MOD-20080818-01069 (Call Sign E060449)
File No. SES-MOD-20080818-01070 (Call Sign E060450)
File No. SES-MOD-20080818-01071 (Call Sign E060451)
File No. SES-MOD-20080818-01066 (Call Sign E060101)

Dear Mr. Nalda:

On August 18, 2008, RaySat Antenna Systems (RaySat) filed the above captioned applications to modify six earth-station licenses by adding emission designators with wider bandwidths and additional satellite points of communications. For the reasons discussed below, we dismiss the applications as defective, without prejudice to refileing.


Section 25.112 of the Commission's rules, 47 C.F.R. § 25.112, 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. RaySat's applications contain the following deficiencies:

In response to item E47 of Schedule B, Raysat proposes to add a 10M7G7W emission designator with a 41.2 dBW maximum EIRP per carrier (item E48), a 9M47G7W emission designator with a 41.2 dBW maximum EIRP per carrier (item E48), and a 2M07G7W emission designator with a 35.7 dBW maximum EIRP per carrier (item E48). In response to item E40 of Schedule B, Raysat lists the total EIRP for all carriers as 30.5 dBW. Since the maximum EIRP per carrier for each of the emissions is greater than the total EIRP for all carriers, we cannot determine the emission power for the proposed operations.

Additionally, in the radiation hazard analysis in Attachment 1 to the applications, Raysat lists the maximum transmit power per carrier as 20 Watts. Based on item E48 of Schedule B and the 26.8 dBi antenna transmit gain listed in its license, we calculate that the maximum transmit power per carrier is 27.54 Watts. Thus, the radiation hazard analysis is inconsistent with the proposed operations and is therefore defective.

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 on delegations of authority, 47 C.F.R. §0.261, we dismiss RaySat's applications without prejudice to refiling.¹

Sincerely,



Scott A. Kotler
Chief, Systems Analysis Branch
Satellite Division
International Bureau

¹ If RaySat refiles an application in which the deficiencies identified in this letter have been corrected but otherwise identical to the one dismissed, it need not pay an application fee. See 47 C.F.R. § 1.1109(d).