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JUL 24 2009  
 Satellite Division  
 International Bureau

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JUL 22 2009

Federal Communications Commission  
 Office of the Secretary

July 22, 2009

**VIA HAND DELIVERY**

Marlene H. Dortch, Secretary  
 Federal Communications Commission  
 445 12th Street, S.W.  
 Washington, DC 20554

Re: **Clarification Concerning SWE-DISH Call Sign E080208**

Dear Ms. Dortch:

SWE-DISH Satellite Systems, Inc. ("SWE-DISH") operates the Drive-Away CCT120 transportable earth station ("CCT120") pursuant to Federal Communications Commission ("Commission") authority granted under Call Sign E080208.<sup>1</sup> The CCT120 is an elliptical antenna with a major axis of 1.2 meters and a minor axis of 0.833 meters. This letter clarifies that the Fly-Away FA120KS ("FA120KS") earth station is manufactured to the identical specifications as the CCT120.<sup>2</sup>

SWE-DISH also clarifies that future applications seeking permanent authority to operate the FA120KS may cross reference Call Sign E080208 to satisfy the antenna gain pattern obligations specified in Commission Rule Section 25.132(b)(3).<sup>3</sup> Pursuant to the Commission's streamlined earth station licensing procedures, applicants proposing to use non-routine earth station antennas are not required to provide antenna radiation plots as exhibits to their applications.<sup>4</sup> Instead, such applicants need only provide the file number and call sign for an existing license that authorizes use of the proposed antenna.<sup>5</sup> As discussed above, the FA120KS and CCT120 are identical and share identical radiofrequency emission characteristics. For the purposes of evaluating compliance with earth station antenna performance standards, these antennas should be considered the same model.

<sup>1</sup> See File No. SES-LIC-20080918-01222; see also File No. SES-MOD-20090317-00330.

<sup>2</sup> Please note that the primary reflector of the Fly-Away FA120KS is made of a different composite material than the CCT120. The two antennas are otherwise identical and share identical radiofrequency emission characteristics.

<sup>3</sup> 47 C.F.R. § 25.132(b)(3).

<sup>4</sup> See International Bureau Establishes Website for List of Previously Approved Non-Routine Earth Station Antennas, *Public Notice*, DA 09-425 (Rel. Feb. 23, 2009) ("NRESA PN"); see also, 2000 Biennial Regulatory Review -- Streamlining and Other Revisions of Part 25 of the Commission's Rules Governing the Licensing of, and Spectrum Usage by, Satellite Network Earth Stations and Space Station, *Fifth Report and Order*, 20 FCC Rcd 5666 (2005).

<sup>5</sup> Applicants must also "seek[] to offer the same kinds of services as the previously authorized antenna and with the same or substantially similar operating conditions." See *NRESA PN* at 1.

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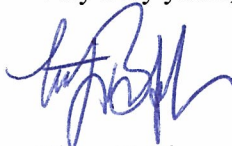
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If you have any questions regarding this letter, please do not hesitate to contact the undersigned at 202-373-6140.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Ulises R. Pin".

Ulises R. Pin  
Tim Bransford

cc (by email): Holly Riesz