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

**Re: File No. SES-MOD-20091210-01568, Call Sign E050143
Request of Clear Channel Satellite Services for Correction of License**

Dear Ms. Dortch:

Clear Channel Satellite Services (“Clear Channel”), by its attorneys, hereby requests that the Commission issue a corrected license for call sign E050143. The current license has erroneous information regarding the space stations with which E050143 is authorized to communicate.

The E050143 license is for a Ku-band VSAT network with the hub station in Englewood, Colorado, and various remote terminal antenna sizes and models. Included on the authorization are some antennas that do not comply with the antenna performance requirements of Section 25.209 of the Commission’s rules, 47 C.F.R. § 25.209. Accordingly, when Clear Channel filed the initial application for this license in 2005, the company submitted documentation demonstrating that use of the non-compliant antennas had been coordinated for operations on the AMC-1 space station at 103° W.L. and on the AMC-4 space station at 101° W.L.¹

However, although the initial application correctly identified the space stations and orbital locations for use with the non-compliant antennas, the license granted in response to the application did not. Specifically, instead of identifying AMC-1 at 103° W.L. as an authorized point of communications for the non-compliant antenna models as requested, the license listed the AMSC-1 satellite at 103° W.L.² This is clearly incorrect, as AMSC-1 is not a Ku-band satellite that could be used for

¹ See File No. SES-LIC-20050518-00622 (letter from Liz Karr, Office Manager of Clear Channel Satellite Services, concerning coordination of the proposed remote terminal operations using SES Americom’s AMC-1 satellite at 103° W.L. and AMC-4 satellite at 101° W.L. and affidavits of adjacent satellite operators confirming coordination of those operations).

² See File No. SES-LIC-20050518-00622, license granted Aug. 30, 2005, at 2, Section D.

VSAT operations.³ The current license still includes this error, with AMSC-1 at 103° W.L. identified as an authorized point of communications for two of Clear Channel's sub-meter antenna models.⁴

For two other antenna models authorized to communicate with AMC-1, the satellite is correctly identified, but the orbital location is listed as 101° W.L. instead of 103° W.L.⁵ Clear Channel believes this error was introduced because at one time the drop-down menu in the earth station application Form 312 Schedule B had the wrong orbital location listed for the AMC-1 space station.⁶ Again, however, the documentation Clear Channel submitted in support of its applications correctly identified both the space stations and orbital locations to be used.⁷

There is also an omission on the license with respect to the satellites with which Clear Channel's 0.98 meter antennas are authorized to communicate. Specifically, the license specifies only AMC-1 as a point of communication for these antennas.⁸ The application to add these terminals to E050143, however, requested authority for communications with both AMC-1 at 103° W.L. and AMC-4 at 101° W.L.⁹

Finally, Clear Channel notes that the AMC-4 satellite has been replaced at 101° W.L. by the SES-1 spacecraft. Clear Channel's operations at this orbital location continue on SES-1 rather than AMC-4 pursuant to the same technical characteristics. Clear Channel seeks an update of the license for call sign E050143 to reflect that SES-1 rather than AMC-4 is now the authorized satellite at 101° W.L.

³ Furthermore, AMSC-1 is licensed to operate at the nominal 101° W.L. orbital location, not at 103° W.L.

⁴ See File No. SES-MOD-20091210-01567, license granted Feb. 17, 2010, at 4, Section D (points of communication for remote terminals designated TT09612 .96M and TT0753 .75M).

⁵ *Id.*, (points of communication for remote terminals designated TT0.9816 and TT1016R).

⁶ The AMC-1 space station has been assigned to 103° W.L. for the entire time Clear Channel has been using the satellite, but the Schedule B drop down menu for a time identified the AMC-1 orbital location as 101° W.L.

⁷ See File Nos SES-MOD-20060420-00695 (letter from Liz Karr, Office Manager of Clear Channel Satellite Services, concerning coordination of the proposed remote terminal operations using SES Americom's AMC-1 satellite at 103° W.L. and AMC-4 satellite at 101° W.L. and affidavits of adjacent satellite operators confirming coordination of those operations); SES-MOD-20060710-01124 (same); & SES-MOD-20071121-01608 (letter from SES Americom regarding coordination of proposed remote terminal operations using AMC-1 at 103° W.L. and AMC-4 at 101° W.L.).

⁸ See File No. SES-MOD-20091210-01567, license granted Feb. 17, 2010, at 4, Section D (points of communication for remote terminals designated TT0.9816).

⁹ See File No SES-MOD-20060420-00695 (letter from Liz Karr, Office Manager of Clear Channel Satellite Services, concerning coordination of the proposed remote terminal operations using SES Americom's AMC-1 satellite at 103° W.L. and AMC-4 satellite at 101° W.L. and affidavits of adjacent satellite operators confirming coordination of those operations).

Clear Channel respectfully requests that the Commission issue a corrected license for this call sign. Attached is a table showing the required changes to Section D of the license. Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

/s/ Karis A. Hastings

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Attachment

cc: Kathryn Medley
Paul Blais

Required corrections to license for call sign E050143, Section D (insertions shown with double underlining, and deletions shown with strikethrough):

D) Point of Communications:

The following stations located in the Satellite orbits consistent with Sections B and C of this Entry:

- 1) CCSS INV 6.1A to All authorized U.S. Domestic (ALSAT) Satellites.
- 2) TT09612 .96M to SES-1 ~~AMC-4~~ @ 101 degrees W.L. (U.S.-licensed domestic satellite)
- 3) TT09612 .96M to AMC-1 ~~AMSC-1~~ @ 103 degrees W.L. (U.S.-licensed domestic satellite)
- 4) TT0753 .75M to SES-1 ~~AMC-4~~ @ 101 degrees W.L. (U.S.-licensed domestic satellite)
- 5) TT0753 .75M to AMC-1 ~~AMSC-1~~ @ 103 degrees W.L. (U.S.-licensed domestic satellite)
- 6) TT0.9816 to AMC-1 @ 103 ~~101~~ degrees W.L. (U.S.-licensed domestic satellite)
- 7) TT0.9816 to SES-1 @ 101 degrees W.L. (U.S.-licensed domestic satellite)
- 87) TT1016R to SES-1 ~~AMC-4~~ @ 101 degrees W.L. (U.S.-licensed domestic satellite)
- 98) TT1016R to AMC-1 @ 103 ~~101~~ degrees W.L. (U.S.-licensed domestic satellite)
- 109) TT1240DR to All authorized U.S. Domestic (ALSAT) Satellites.
- 1140) TT1250TV to All authorized U.S. Domestic (ALSAT) Satellites.
- 1244) TTRVN_9808 to All authorized U.S. Domestic (ALSAT) Satellites.