

Showing of Compliance with Section 25.222 and Supporting Exhibits

Vizada, Inc.

Application for Modification of License to
Add up to 400 SeaTel Model 6006 1.5 Meter Remote ESV Antennas to its
Authorization to Provide ESV Service via its Southbury, CT Teleport

Call Sign KA313

By this application applicant Vizada, Inc. (Vizada, formerly Telenor Satellite, Inc.) seeks authority to add up to 400 SeaTel model 6006 1.5 meter remote ESV antennas to its authorization to provide ESV service via its Southbury, CT teleport, call sign KA313. These remote ESVs will be located on vessels traveling in U.S. and international waters. They will operate with a hub antenna at Southbury that has already been licensed by the commission and will be utilized to provide ESV service as previously authorized by the commission.

Vizada's current KA313 ESV authorization is pursuant to File Number SES-MOD-20070925-01318, granted November 20, 2007. This grant authorized Vizada to operate up to 550 SeaTel model 4003A, model 4006 and model 4996T remote ESV antennas to communicate via All U.S. Domestic (ALSAT) Satellites, the Galaxy 10R satellite @ 123 W.L. and the INTELSAT 705 satellite @ 50 W.L. to provide ESV service.

Vizada now seeks authorization to add up to 400 SeaTel model 6006 1.5 meter remote ESV antennas to the authorization previously granted by the commission for the ESV Remotes to communicate via the Galaxy 10R satellite @ 123 W.L., the INTELSAT 705 satellite @ 50 W.L. and ALSAT Satellites on the Permitted Space Station List to provide ESV service. As with the other SeaTel antennas previously authorized for ESV service operation of the model 6006 ESV antennas will be in full compliance with the requirements set forth in the commission's ESV order, 20 FCC Rcd 674 (2005), and in part 25 of the Rules as well as all provisions of the call sign KA313 license.

Vizada's Showing of Compliance with Part 25 of the Commission's Rules and the exhibits required by Section 25.222 follow herewith.

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Showing of Compliance with Part 25 of the Commission's Rules

Section 25.222

- (a) (1) Comply. See Blaney and Varan declarations and Figure 1.
- (a) (2) Comply. See Blaney and Varan declarations and Figure 2.
- (a) (3) Comply. See Blaney and Varan declarations and Figure 1.
- (a) (4) Comply. See Blaney and Varan declarations and Figures 3 and 4.
- (a) (5) Comply. The SeaTel antennas provide automatic polarization adjustments. Further, the cross pole isolation is measured during the process of commissioning with the assistance of the satellite operator's test center to verify proper alignment.
- (a) (6) Comply. See Blaney declaration.
- (a) (7) Comply. See Blaney declaration.
- (a) (8) Comply. The Vizada Security Officer has authority and ability to cease all emissions from ESVs through the facilities of Telenor's Southbury Teleport. This point of contact is available 24 hours a day, seven days a week by calling +1-301-838-7700.
- (a) (9) Comply. The SeaTel antennas provide field-programmable blockage to prevent radiation toward occupied areas if necessary. Further, Radiation Hazard Warning signs are used to alert persons nearby of the potential hazard.
- (a) (10) Comply. See Figure 5, 6 and 7.
- (b) Comply. See Blaney and Varan declarations and Figure 1, Figure 2, Figure 3 and Figure 4.
- (c) (1) Comply. These records are being collected and maintained as specified. Requests to make this data available may be directed to the Vizada Security Officer by calling +1-301-838-7700.
- (c) (2) Comply.

(c) (3) Comply.

(d) Comply. We will not operate in the 14.0-14.2 GHz band in the specified locations.

(e) Comply. We will not operate in the 14.47-14.5 GHz band in the specified locations.

(f) Comply.




Marine Stabilized Antenna Systems

Declaration of Sea Tel, Inc.

1. Sea Tel designs, develops, manufactures and services marine stabilized antenna systems for satellite communications at sea. Vizada Inc., proposes to use the Sea Tel Model 6006 antenna as part of its Ku-band Earth Station on Vessels ("ESV") network.
2. The Sea Tel Model 6006 antenna, referenced in paragraph 1, will meet the off-axis EIRP spectral density envelope set forth in FCC 47 C.F.R. § 25.222(a)(1)-(4) when the input power to the antenna system is limited to -14 dBW/4kHz.
3. The Sea Tel antennas referenced in paragraph 1 will maintain a stabilization pointing accuracy of better than 0.2 degrees under specified ship motion conditions. FCC compliant supervisory software has been developed to continuously monitor the pedestal pointing error and will trip an error flag whenever an unexpected event occurs that causes the instantaneous pointing error to exceed 0.5 degrees. This flag will not clear until the pedestal error decreases to 0.2 degrees or less. The state of this flag is used as an additional logic input to the existing "Transmit Mute" function of the Sea Tel below decks controller. By connecting the "Transmit Mute Output" of the Sea Tel below decks controller to the "Mute Input" of the satellite modem, the provisions of FCC 47 C.F.R. § 25.222(a)(7) are satisfied.
4. Sea Tel maintains all relevant test data, which is available upon request, to verify these declarations.

Executed on: 8-Nov-2007

By:


Peter G. Blaney
Vice President, Product Development
Sea Tel, Inc.

DECLARATION OF CHRISTER VARAN

I, Christer Varan, hereby declare as follows:

1. I am employed by Vizada AS ("Vizada"). My title is Product Manager, Sealink. In that capacity, I am responsible for all ESV operations through Telenor's earth stations, including those in Southbury, CT and Santa Paula, CA.

2. I have read the attached Declarations of SeaTel, Inc. dated October 16, 2006 and November 8, 2007, and have worked closely with SeaTel to ensure that Telenor's ESV operations will be in compliance with the FCC's ESV rules.

3. The SeaTel Ku-band antennas that will operate through the Southbury and Santa Paula earth stations are the Model 4003A, the Model 4006, Model 4996T and Model 6006. I am aware that, in order to meet the off-axis EIRP spectral density limits defined in Section 25.222(a)(1)-(4) of the FCC's ESV Rules, the input power to the antenna system must be limited to -17.9 dBW/4kHz for the 4003A and 4006 antennas, -17dBW/4kHz for the 4996T and -14 dBW/4kHz for the 6006.

4. Telenor will take all necessary steps to ensure that the input power to the various SeaTel antennas is limited in the manner described above. Telenor will ensure that the specified power spectral densities are not exceeded by using the appropriate coding. For Ku-band, $\frac{3}{4}$ QPSK will typically meet the requirements. Telenor will also monitor absolute power levels, either directly through its hub earth stations or by working with the satellite operators.

I, Christer Varan, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on November 12, 2007.



Christer Varan

Figure 1

Sea Tel, Inc.

1.5 Meter EIRP Spectral Density @ -14 dBW / 4KHz input and 0.75 dB radome loss

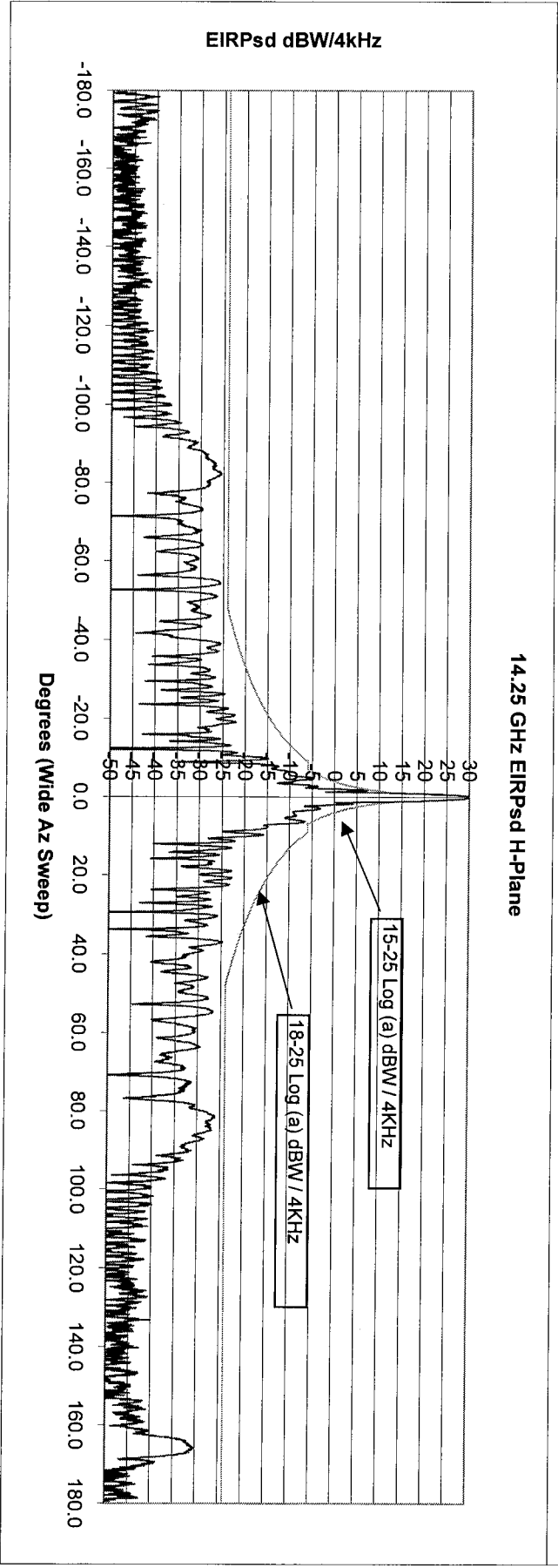
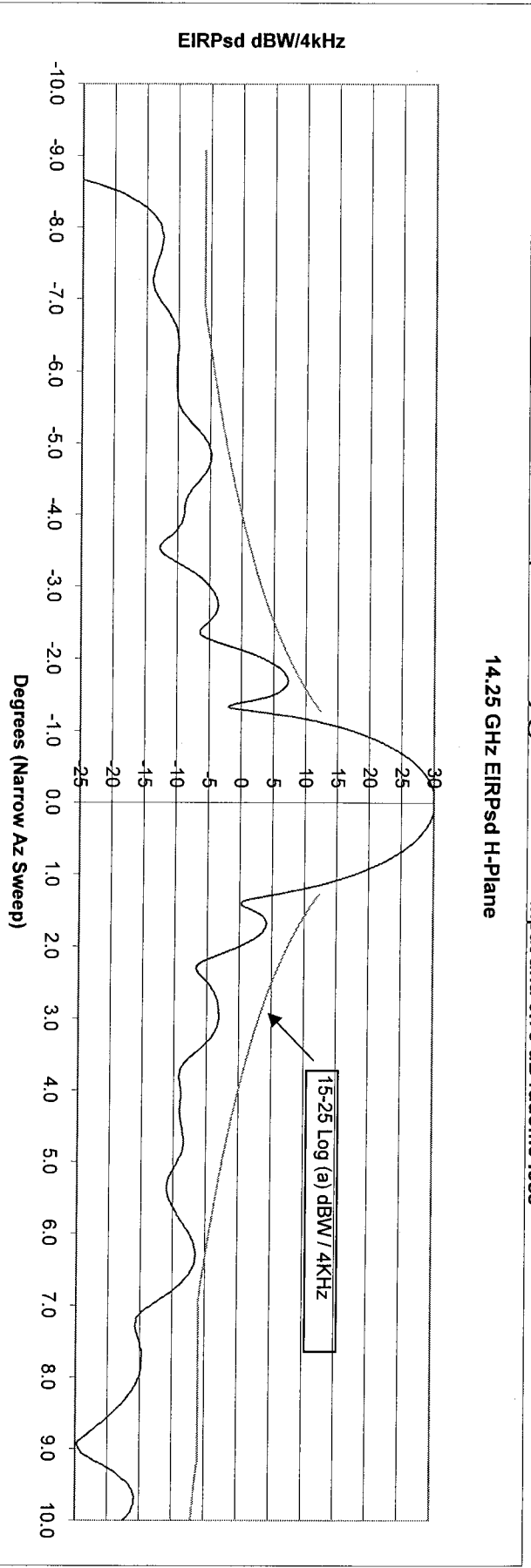


Figure 2

Sea Tel, Inc.
1.5 Meter EIRP Spectral Density @ -14 dBW / 4kHz input and 0.75 dB radome loss

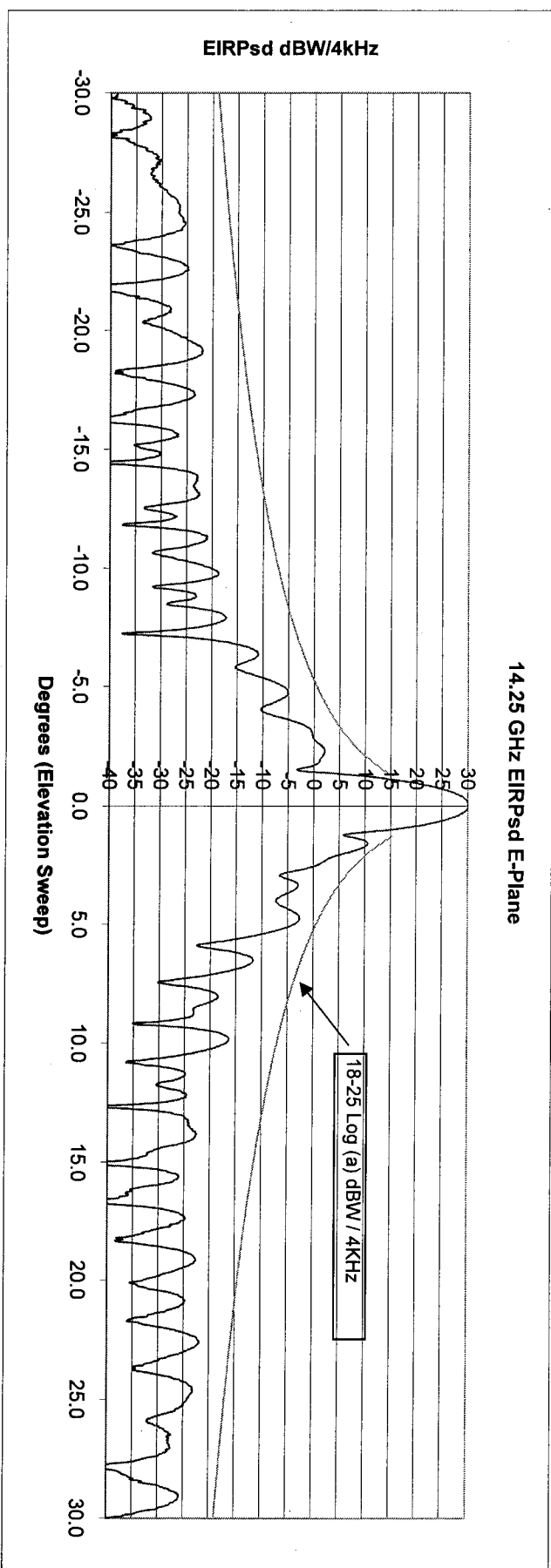


Figure 3

Sea Tel, Inc.
1.5 Meter EIRP Spectral Density @ -14 dBW / 4kHz input and 0.75 dB radome loss

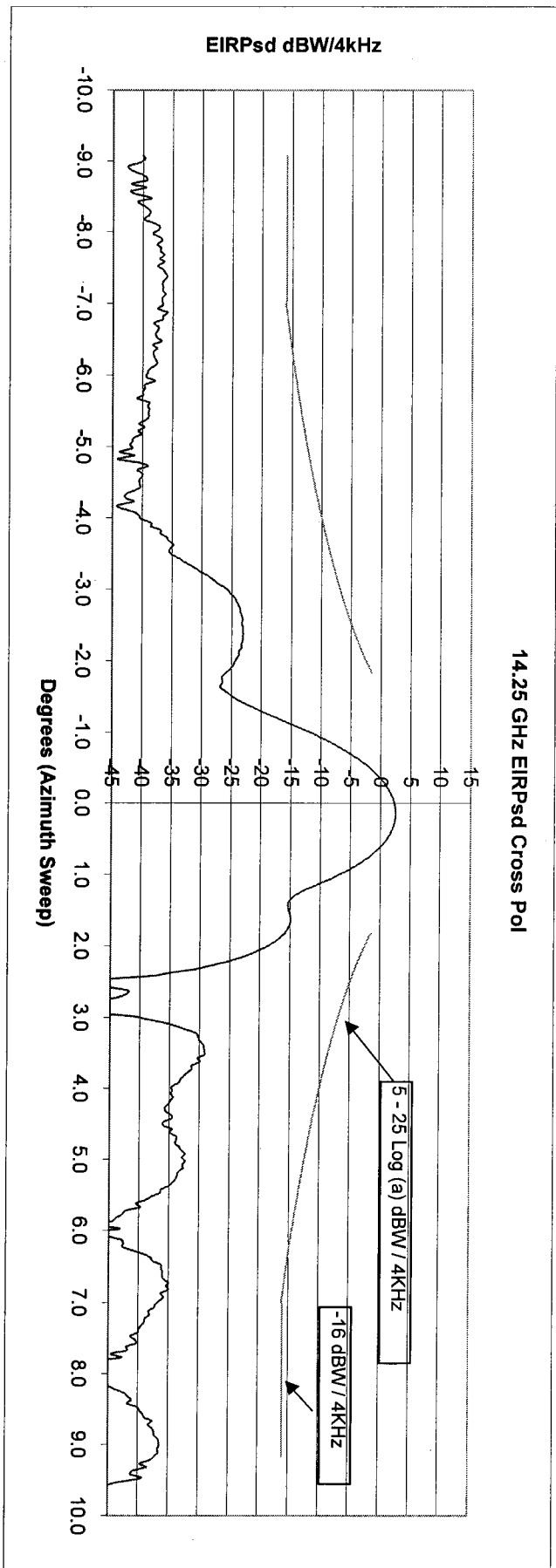


Figure 4

Sea Tel, Inc.
1.5 Meter EIRP Spectral Density @ -14 dBW / 4kHz input and 0.75 dB radome loss

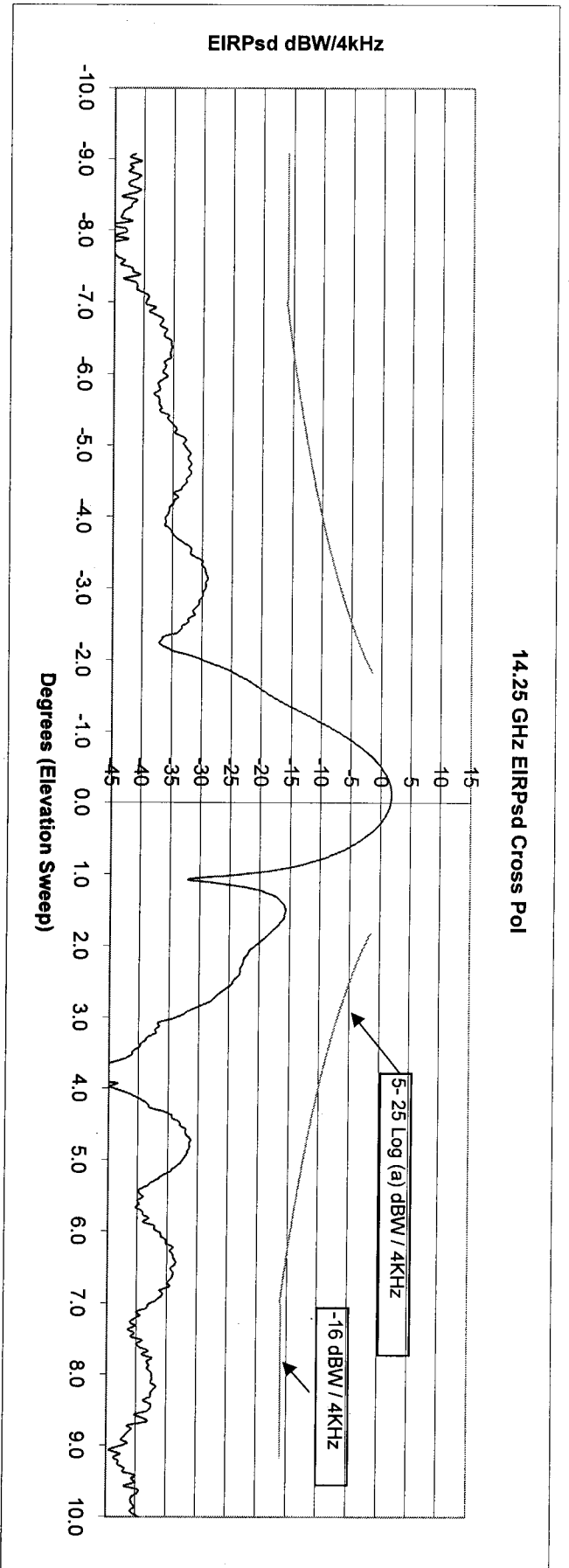
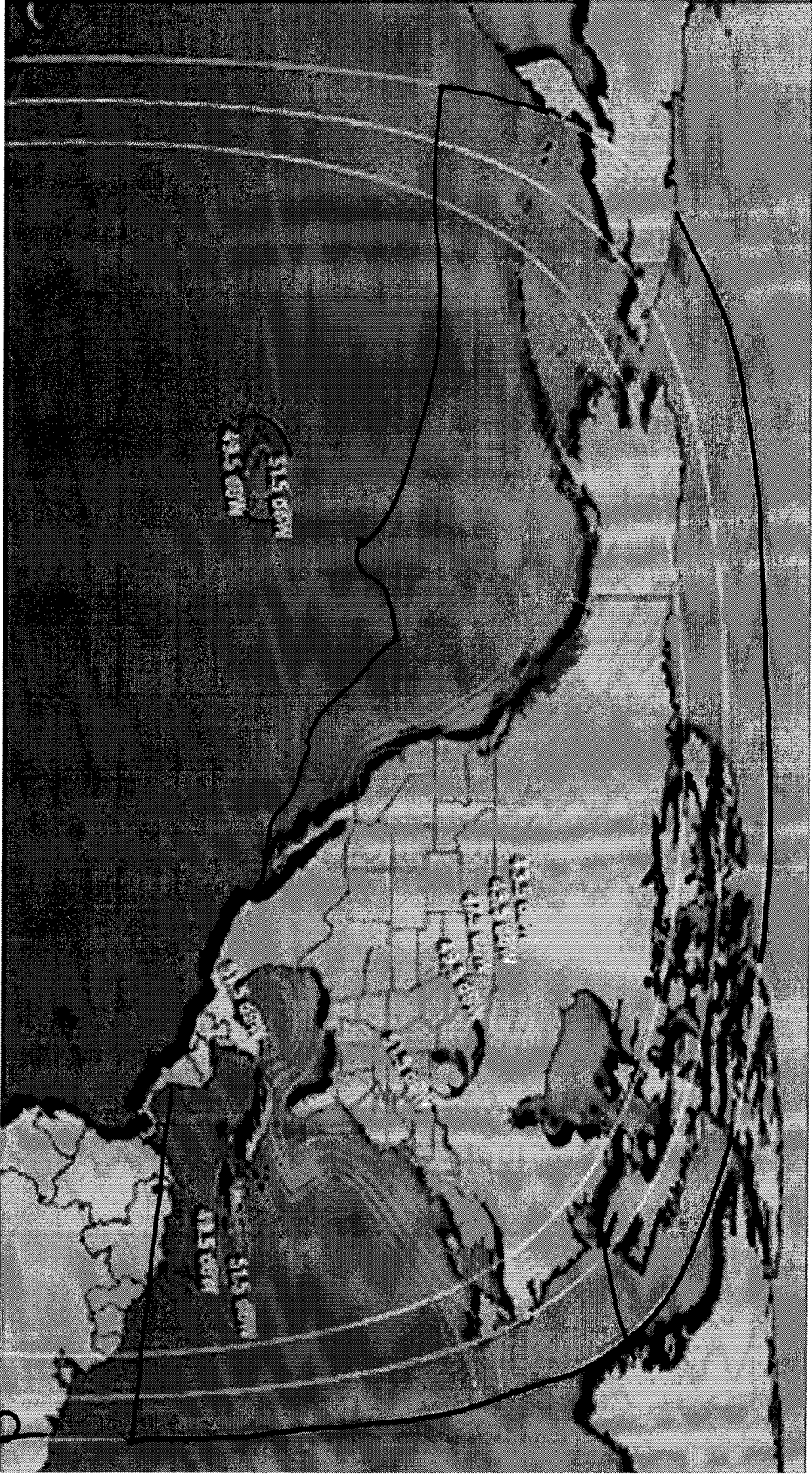
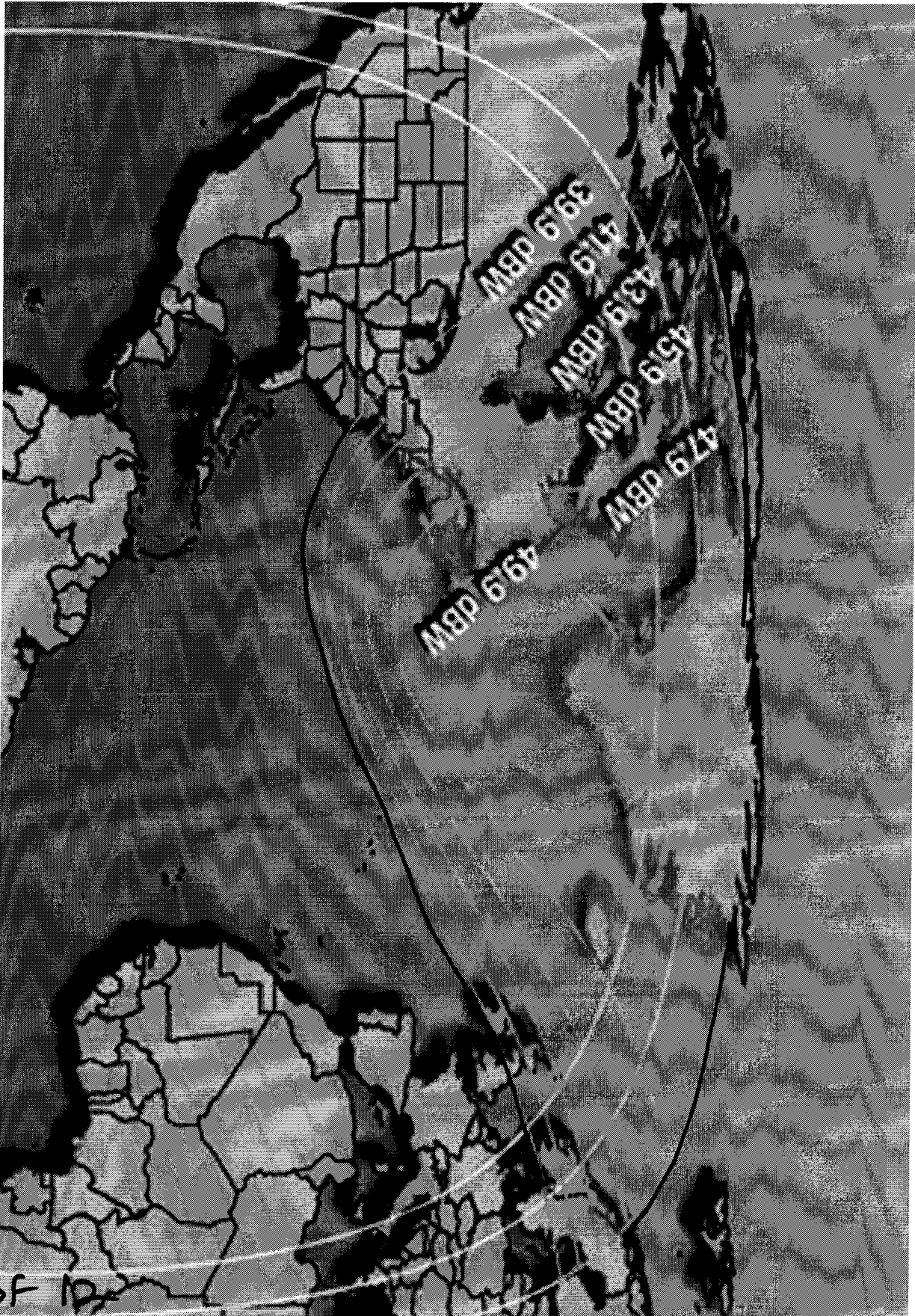


Figure 5



GALAXY 10R

Figure 6



INTELSAT 705 #1

Figure 7

INTELSAT 705 #2

