

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY
TYSONS CORNER, VA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES
MUMBAI, INDIA

DIRECT LINE: (202) 342-8573

EMAIL: jgriffin@kelleydrye.com

December 17, 2010

BY IBFS

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

Re: Comtech Mobile Datacom Corp.
E990143
IB File No. SES-MOD-20101208-01520

Dear Ms. Dortch:

Comtech Mobile Datacom Corp. ("Comtech"), by its attorney, hereby submits its analysis of the number of packets that have exceeded 1-second in duration since May 2009, as required by the Commission's Order and Authorization in IB File No. SES-AMD-20070907-01251, DA 09-906, rel. May 15, 2009.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

Comtech Mobile Datacom Corp.

By:



Joan M. Griffin
Its Attorney

Enclosure

Comtech Mobile Datacom Corp.
E990143, IB File No. SES-MOD-20101208-01520

1-Second Analysis

| Month | Number of Packets Exceeding 1-Second in Duration | | | | | MET Unit Counts | | | | | | | | | |
|---------|--|---------------|------------|---------------------------------------|--------------------------|-----------------|---------------|-----------------|-------|-------|--------------|-----|-------|------------|-------|
| | Model MT202/203 | | | Total | Model MT2011 >= 60 bytes | | | Model MT202/203 | | | Model MT2011 | | | | |
| | C2-Prod | C2/C3/X3-Test | H1/H2-Prod | | H1/H2-BFT | MTS | H1/H2 | C2 | C3/X3 | H1/H2 | Total | BFT | H1/H2 | MTS | H1/H2 |
| 2009-05 | 2694 | 3667 | 0 | 6361 | 70953 | 585 | 71538 | 47 | 2 | 0 | 49 | 100 | 12 | 112 | |
| 2009-06 | 4774 | 2166 | 0 | 6940 | 58386 | 68 | 58454 | 41 | 4 | 0 | 45 | 80 | 6 | 86 | |
| 2009-07 | 3071 | 119 | 0 | 3190 | 37596 | 682 | 38278 | 44 | 2 | 0 | 46 | 117 | 8 | 125 | |
| 2009-08 | 3102 | 34 | 252 | 3388 | 10436 | 667 | 11103 | 50 | 1 | 4 | 55 | 54 | 6 | 60 | |
| 2009-09 | 3890 | 178 | 81 | 4149 | 12093 | 867 | 12960 | 57 | 2 | 3 | 62 | 67 | 13 | 80 | |
| 2009-10 | 5578 | 330 | 106 | 6014 | 8350 | 702 | 9052 | 60 | 3 | 3 | 66 | 37 | 11 | 48 | |
| 2009-11 | 4788 | 53 | 32 | 4873 | 9861 | 1672 | 11533 | 67 | 1 | 2 | 70 | 56 | 19 | 75 | |
| 2009-12 | 3402 | 36217 | 59 | 39678 | 8803 | 585 | 9388 | 78 | 2 | 3 | 83 | 86 | 9 | 95 | |
| 2010-01 | 3999 | 106964 | 99 | 111062 | 12333 | 1355 | 13688 | 84 | 1 | 5 | 90 | 82 | 22 | 104 | |
| 2010-02 | 5000 | 40420 | 119 | 45539 | 8301 | 1610 | 9911 | 89 | 1 | 3 | 93 | 114 | 27 | 141 | |
| 2010-03 | 4985 | 55 | 95 | 5135 | 9195 | 500 | 9695 | 67 | 1 | 4 | 72 | 224 | 5 | 229 | |
| 2010-04 | 3720 | 1587 | 391 | 5698 | 12321 | 1323 | 13644 | 82 | 1 | 5 | 88 | 207 | 19 | 226 | |
| 2010-05 | 3690 | 1333 | 76 | 5099 | 36372 | 1556 | 37928 | 63 | 1 | 3 | 67 | 223 | 40 | 263 | |
| 2010-06 | 4144 | 0 | 19 | 4163 | 54412 | 1665 | 56077 | 84 | 0 | 1 | 85 | 166 | 40 | 206 | |
| 2010-07 | 7817 | 1 | 58 | 7876 | 32695 | 2906 | 35601 | 105 | 1 | 2 | 108 | 227 | 38 | 265 | |
| 2010-08 | 4045 | 423 | 73 | 4541 | 137778 | 5688 | 143466 | 76 | 5 | 2 | 83 | 256 | 14 | 270 | |
| 2010-09 | 5045 | 0 | 6 | 5051 | 35521 | 3216 | 38737 | 84 | 0 | 1 | 85 | 231 | 36 | 267 | |
| 2010-10 | 6802 | 17 | 6 | 6825 | 85704 | 5185 | 90889 | 93 | 1 | 1 | 95 | 224 | 19 | 243 | |
| | | | | Monthly Average | 15310 | | 37330 | | | | 75 | | | 161 | |
| | | | | Daily Average | 494 | | 1204 | | | | | | | | |
| | | | | Likelihood of Single Packet | 0.572% | | 1.394% | | | | | | | | |
| | | | | Exceeding 1-Second in Duration | | | | | | | | | | | |

* Based average likelihood of an in-process transmission during any second of the day