



April 26, 2021

By Electronic Filing

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

Re: SES-MOD-20200528-00575
WB36 Modification Application
Transmit Gain for Ka-band Antennas @ 29.5 GHz and Suggested Edits for Draft License

Dear Ms. Dortch,

Please accept this letter as a pleading to provide the transmit gain @ 29.5 GHz for the three Ka-band antennas which the Modification Application seeks to add to the WB36 license Earth Station on Vessel authorizations and to request edits to the license grant draft.

The gain values for transmit @ 29.5 GHz for the three antennas are:

SeaTel 2400KA - 54.01 dBi @ 29.5 GHz

Intellian V240MTKA - 51.6 dBi @ 29.5 GHz

Intellian V240MTGEN2KA - 51.7 dBi @ 29.5 GHz

The following edits are suggested for the license grant draft:

In Section A) Site Location(s) –



It is requested that instead of the Marlink Houston office address the following be used for the location for Site ID2-

Site ID2 “KU-BAND ESV & VSAT Remotes
 US AND INTL WATERS AND CONUS, AK, HI, US&P”

It is requested that instead of the Marlink Houston office address the following be used for the location for Site ID4-

Site ID4 “KA-BAND ESV & VSAT Remotes
 US AND INTL WATERS AND CONUS, AK, HI, US&P”

In Section E) Antenna Facilities-

It is requested that the name of the last antenna on page 38 of the license draft (the 15th antenna in Section E) that is listed as “GEN2KA” be changed in order to identify it more clearly. It is requested that it be called “V240MT2KA”.

It also requested that the name of the Ku-band version of that antenna be changed for the same reason. That antenna is listed on page 43 of the license draft as “V240MTG2K”. It is requested that it be called “V240MT2KU”.

Marlink’s understanding is that once the above name changes are made in Section E) that will automatically cause the corrected name to be specified in the other sections of the license. If not, please make the name changes in Sections B) and C) as follows:

In Section B) Particulars of Operations-

Lines 513 – 528 – Please change the name for the associated antenna for these lines to “V240MT2KA”.

Lines 529 – 536 – Please change the name for the associated antenna for these lines to “V240MT2KU”.

In Section C) Frequency Coordination

Lines 59 & 60 – Please change the name for the associated antenna for these lines to “V240MT2KU”.

Lines 61 & 62 - Please change the name for the associated antenna for these lines to “V240MT2KA”.

In addition to the above name changes the following edits are also requested in Sections B) and C):

In Section B) Particulars of Operations-

Lines 175 - 188 – Please delete these Emission Designators from the license draft. These Emission Designators for that antenna are covered by lines 513 – 528.

Lines 251 – 258 – It is suggested that these Emission Designators also be deleted as they are included within the Emission Designators listed on lines 259 – 262.



Lines 361 – 368 – It is suggested that these Emission Designators also be deleted as they are included within the Emission Designators listed on lines 369 – 372.

In Section C) Frequency Coordination-

Lines 94 & 95 – Please delete these lines as that antenna is addressed by lines 61 & 62.

Line 50 - It is suggested that this line be deleted as those frequencies are now included in the frequencies listed on line 51.

Line 66 - It is suggested that this line be deleted as those frequencies are now included in the frequencies listed on line 67.

If there are any questions, please contact James G. Lovelace at 281 606 0117 or james.lovelace@marlink.com.

Respectfully Submitted,
Marlink, Inc.