

As explained below, no Frequency Coordinations are being submitted with this Application.

Ku-band Frequency Coordination Statement

Marlink understands that frequency coordination for Ku-band Earth Stations In Motion (ESIM) is required for the specific frequencies and locations specified in §25.228(i)(1) & (3).

The coordination addressed by §25.228(i)(1) has been completed with NASA and the coordination filed with the Commission. Mapping coordinates for 14.0 – 14.2 GHz frequency band Transmit Exclusion Zones required by NASA to protect the TDRSS facilities have been programmed into Marlink's system. It will automatically mute any Marlink ESIM operating in the 14.0 – 14.2 GHz frequency band which enters one of these Exclusion Zones.

Marlink complies with §25.228(i)(2) through implementation of measures to bar operation of Marlink ESIMs in the 14.47 – 14.5 GHz frequency band within the specified distances of the facilities protected per §25.228(i)(2). Marlink's system will automatically mute any Marlink ESIM operating in the 14.47 – 14.5 GHz frequency band which enters one of these Exclusion Zones.

Ka-band Frequency Coordination Statement

Marlink's understands that frequency coordination is required for ESIMs to use the 28.35 – 28.6 and 29.25 – 29.5 GHz frequencies for earth to space communication. Marlink is currently in the process of developing its Ka-band Earth Station on Vessels (ESV) network. Marlink does not at the present time intend to use any frequencies in those bands. If it does elect to use any frequencies in the 28.35 – 28.6 and 29.25 – 29.5 GHz bands in the future it will only do so after successful completion of appropriate coordination.

Marlink understands that coordination with Federal FSS systems is required for ESIM communications in the 17.8 – 20.2 GHz band and that pursuant to US334 of the U.S. Table of Frequency Allocations the FCC shall coordinate with NTIA applications for new stations to operate in the areas of Denver, CO; Washington, DC; San Miguel, CA and Guam. The Ka-band ESV antennas for which Marlink is seeking authorization will not be capable of operating in the Denver, CO, Washington, DC or San Miguel, CA areas.

It has not yet been determined whether Marlink's Ka-band network will include satellite coverage in the area of Guam. If in the future Marlink establishes capability to provide ESV service in the area of Guam utilizing frequencies in the 17.8 – 20.2 GHz band for space to earth communications, it will complete appropriate coordination.