

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FILED/ACCEPTED

APR 30 2008

Federal Communications Commission  
Office of the Secretary

In the Matter of	)	
	)	
Request to Streamline Licensing of L-band	)	
User Terminals Using Inmarsat Satellites as	)	SES-PDR-20080303-00367
Points of Communication	)	
	)	

COMMENTS OF AMTECH SYSTEMS LLC

Amtech Systems LLC (“Amtech”), by its counsel, hereby submits these Comments in support of the Petition for Declaratory Ruling filed by Inmarsat, Inc. (“Inmarsat”) proposing that the International Bureau (the “Bureau”) make a ministerial change in the way that it specifies authorized points of communication in Inmarsat L-band<sup>1</sup> user terminal licenses.

Amtech holds two FCC blanket mobile earth station licenses with the Inmarsat 3F4 spacecraft at 142° W.L. as an authorized point of communication. Currently, Amtech must apply for modification of its earth station licenses each time it seeks to communicate with a new Inmarsat satellite or an existing Inmarsat satellite in a new orbital location. Inmarsat’s proposal would create an “ISAT” list of Inmarsat spacecraft that have been approved for U.S. service in the L-band and automatically add “ISAT” as a point of communication in existing earth station licenses that specify an Inmarsat satellite as a point of communication. Amtech supports this proposal as it would automatically expand Amtech’s authority to communicate

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<sup>1</sup> The L-band, as described in these Comments, refers to Inmarsat’s coordinated spectrum in the United States. The L-band encompasses frequencies from 1525-1544/1545-1559 MHz and 1626.5-1645.5/1646.5-1660 MHz. The frequencies 1525-1544 MHz and 1626.5-1645.5 MHz are referred to as the “lower L-band” and 1545-1559 MHz and 1646.5-1660.5 MHz are referred to as the “upper L-band.”

with Inmarsat L-band spacecraft once those spacecraft have been approved for U.S. service.

Designating “ISAT” as a point of communication in L-band earth station licenses would provide significant public interest benefits. Streamlining the earth station licensing process would minimize regulatory delay, conserve Commission resources, and speed service to the public. The Inmarsat proposal also shifts the obligation to provide the required technical and regulatory showings from the earth station licensee to the satellite operator in possession of such information, thus ensuring more accurate FCC filings. Moreover, it is consistent with other procedural streamlining mechanisms the Commission has adopted for other satellite services.<sup>2</sup>

For the foregoing reasons, Amtech supports Inmarsat’s proposal and requests that the Commission create a list of all Inmarsat spacecraft that are approved to provide L-band service to the United States. In addition, Amtech requests that the Commission modify Amtech’s existing two blanket earth station licenses (call signs E990316 and E030120) to specify “ISAT” as a designated point of communication,<sup>3</sup> and allow Amtech and other prospective earth station licensees to specify “ISAT” as the designated point of

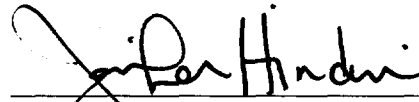
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<sup>2</sup> *Intelsat North America, LLC, Application for Authority to Modify Earth Station Authorization to Provide Launch and Early Orbit Phase (“LEOP”) operations for Newly Launched Satellites*, File Nos.: SES-MOD-20050615-00751, SES-AMD-20051116-01587, Call Sign E040125, Order and Authorization, DA 06-2557 ¶ 14 (Dec. 21, 2006) (designating “LEOP” as a new point of communication); Public Notice, “International Bureau Satellite Engineering Branch Information: Revisions to Earth Station Licenses Authorized to Access INTELSAT,” Report No. SPB-172 (July 20, 2001) (removing conditions on the use of Intelsat satellites for domestic service following Intelsat’s privatization). *Amendment of the Commission’s Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service*, First Order on Reconsideration, 15 FCC Rcd 7207 ¶ 16 (1999) (creating the “Permitted List” of non-US licensed satellites and granting authority for routine C- and Ku-band earth station licensees to communicate with Permitted List satellites ).

<sup>3</sup> *See* File No. SES-MFS-20070511-00637 (Call Sign E990316) (granted Mar. 27, 2008); File No. SES-MFS-20070511-00638 (Call Sign E030120) (granted Mar. 27, 2008).

communication in future applications, thereby providing authority to communicate with all Inmarsat spacecraft that are approved from time to time to serve the United States.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jennifer D. Hindin". The signature is written in a cursive style and is positioned above a horizontal line.

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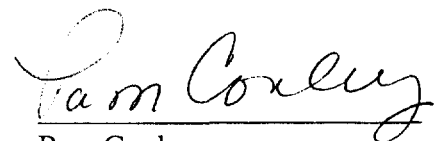
April 30, 2008

**CERTIFICATE OF SERVICE**

I, Pam Conley, do hereby certify that on April 30, 2008, I served a copy of Amtech Systems LLC's Comments upon the following parties by first-class U.S. mail:

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