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Mr. Badri A. Younes
Director, Spectrum Management
OASD(NII)
1851 S. Bell Street
Arlington, VA. 22202

Subject: Request for Special Temporary Authority to Communicate with the Telstar 18
Satellite in the Band 3600 – 3650 MHz – Coordination Proposal

Dear Mr. Younes;

In a request for Special Temporary Authority (STA)¹, Loral Skynet Network Services, Inc. requested authority to communicate in the extended C-band frequencies 3600 – 3650 MHz via its Gateway earth station antenna in Kapolei, Hawaii on the island of Oahu.

The application included an electromagnetic compatibility analysis (EMC) as required by footnote US 245 of the Table of Frequency Allocations. This analysis is based on the criteria contained in the NTIA TR-99-361 Report, Technical Characteristics of Radiolocation Systems Operating in the 3.1-3.7 GHz Band and Procedures for Assessing EMC with Fixed Earth Station Receivers. The results of this analysis indicate the existence of unacceptable interference from Department of Defense (DOD) radiolocation operations.

Loral proposes the following conditions as a framework to establish guidelines for its operations in the requested band:

1. Loral may operate in the band 3625 – 3650 MHz. Any future application will be considered on its own merits and Loral is aware that the DOD may not concur.

¹ FCC File No. SAT-STA 20050414-00452, Call sign E980250

2. Loral will accept any unacceptable interference from DOD radiolocation operations, including but not limited to Navy ships, and will manage its networks accordingly.
3. Loral is not entitled to protection from electromagnetic interference (EMI) from DOD radiolocation operations and DOD will not have liability for, or responsibility to resolve, cases of EMI in this band.
4. Loral recognizes that it may choose, at any time, to install an RF filter before the low noise amplifier, in the earth station receive "chain", which will limit potential out-of-band interference.
5. Pursuant to footnote US 245, of the U.S. Table of Frequency Allocations, these frequencies will be used only for international communications.
6. Loral acknowledges that the frequencies below 3600 MHz are not allocated to the Fixed Satellite Service (FSS) and will not seek authorization to operate below 3600 MHz.
7. Loral acknowledges that coordination under US245 is accomplished on a case-by-case basis and any agreement for this STA will not prejudice the coordination of any future applications. Therefore, future deployment of this or other FSS earth stations in this band shall be subject to coordination.

Loral does not object to inclusion of these conditions in the approved STA

Any inquiries regarding this letter should be directed to me at the address above.

Very truly yours,


Stanley Edinger