



ORIGINAL

November 29, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, DC 20554

To: International Bureau, Satellite Division
Re: File Nos. SES-MOD-20070523-00709 and SES-STA-20071102-01251

Dear Ms. Dortch:

At the request of the International Bureau staff, applicant Vizada Satellite, Inc. (VSI) hereby submits the following information regarding its progress toward full compliance with the Commission's C-band ESV rules.

In the above-referenced modification application, VSI requested partial temporary waivers of three subsections of the ESV rules: §§ 25.221 (a)(4), 25.221 (c)(1) and 25.221 (f). VSI requested these waivers for a period of one year. We did not specify a start date for the waiver period, but our previous ESV waivers (for Ku-band service via Santa Paula and Southbury) ran from the date of the first STA granted for each call sign. Were the Bureau to follow this practice again, the one-year waiver period for this application would expire on July 16, 2008.

As of the date of this letter VSI is providing C-band ESV service via the Santa Paula Teleport to 23 vessels. We expect only minor fluctuations in the number of vessels operating via Santa Paula at various times between now and July. At any given point in time 20 to 25 vessels typically receive service from VSI via the Santa Paula Teleport.

The following is a summary of VSI's progress with respect to each of its three waiver requests.

Section 25.221 (a)(7): This subsection requires each C-band ESV terminal to cease transmissions automatically if the angle between the orbital location of the target satellite and the axis of the main lobe of the antenna exceeds 0.5°. A solution has been developed to provide this capability utilizing supervisory software to continuously monitor pointing error and mute the transmitter in accordance with FCC parameters. To date, this solution has been installed on two of the vessels that are, or will soon be, operating via Santa Paula. We plan to complete installation on at least 10 additional vessels over the next 3 months and on the remainder within six months.

Section 25.221 (c)(1): This subsection requires ESV operators to record the location of each vessel carrying C-band ESV equipment at intervals no greater than every twenty minutes. VSI's long term solution for this requirement will pull position information directly from the ESV

terminal's antenna control unit (ACU). While VSI has been developing this solution Inmarsat-C terminals on the vessels are being used to report position information. Of the 23 vessels receiving C-band service via our Santa Paula teleport as of the date of this letter, the Inmarsat-C is functioning properly for 20 of them and automatically reporting the vessels position every 20 minutes as required; thus, we are in full compliance with the tracking requirement with respect to the vast majority of vessels.

The Inmarsat-C terminals on the remaining three vessels do report their positions when queried, but fail to do so automatically. In order to achieve full compliance with the tracking requirement for these vessels VSI must install the long term ACU solution. VSI has finished development of the software for the solution and the hardware has been procured. Full compliance can therefore be achieved as soon as the solution can be installed on board the non-compliant vessels. We anticipate that this installation can be completed on the non-compliant vessels within the next 60 days.

Section 25.221 (f). This subsection requires each C-band ESV terminal to cease transmissions automatically if the vessel enters an area that has not been successfully coordinated. VSI has completed the basic design for the solution it will use to achieve compliance with this requirement, and a prototype box is in the alpha phase of development. The software development and coding required to compare vessel position with mapping coordinates and trigger the muting function are ongoing. Hardware has been procured and is available for loading of software as soon as the latter is ready. We anticipate that software development will take an additional 60 days from today and that installation will be completed over the following 6 months.

We note, however, that our (short-term) inability to meet the automatic shutoff requirement has been substantially mitigated by the successful frequency coordination of virtually all areas served via the Santa Paula Teleport within 200 km from the baseline of the United States. Given the small number of vessels involved, and the very small area that has not been successfully coordinated, VSI is confident of its ability to ensure by manual means that no C-band terminal operates in an uncoordinated area.

Enclosed is a duplicate original of this filing for our records. Please date stamp the duplicate original and return it to the undersigned in the enclosed postage-prepaid envelope.

Any further questions with respect to this matter should be directed to the undersigned.

Respectfully submitted,

VIZADA SATELLITE, INC.

/s/ Keith H. Fagan

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