

Aerospace Electronic Systems
Honeywell Inc.
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June 25, 2008

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

FILED/ACCEPTED
JUN 27 2008
Federal Communications Commission
Office of the Secretary

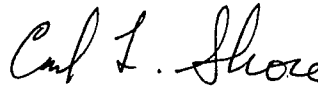
Re: Mobile Earth Station; Call Sign E000156
File No. SES-STA-20080529-00686

Dear Ms. Dortch:

Honeywell International, Inc. filed the above-referenced request for special temporary authority for Call Sign E000156. As a result of discussions between Honeywell's counsel and Commission staff, Honeywell and its counsel have determined that Attachment 1 to the application contains statements that reflect a miscommunication between Honeywell and counsel. Accordingly, Honeywell hereby requests that the document attached hereto entitled "Request for Special Temporary Authority and Waiver" be substituted as the correct Attachment 1 to the application. The Attachment 1 originally filed with the application should be discarded.

Please contact the undersigned with any questions.

Sincerely,



Carl L. Shore

cc (via e-mail): Scott Kotler

REQUEST FOR SPECIAL TEMPORARY AUTHORITY AND WAIVER

Pursuant to Section 25.120 of the Commission's rules, Honeywell International, Inc. ("Honeywell") hereby requests Special Temporary Authority ("STA") to communicate under its mobile earth station license, Call Sign E000156, with Inmarsat 4F2 at 52.75° W.L.

Honeywell's license is a blanket authorization allowing operation of up to 500 single channel Mini-M Aero SATCOM full-duplex terminals aboard U.S. aircraft. The mobile terminals are used as part of a satellite communication system to provide telephone, facsimile and data transmission on private aircraft. Honeywell no longer markets the single channel Mini-M Aero system, but it remains in use by as many as one hundred private aircraft operators that previously purchased the system.

Call Sign E000156 currently lists three authorized points of communication: (1) INMARSAT Ltd.-3 satellite(s) at 15.5 W.L. in AOR-E, (2) INMARSAT Ltd.-3 satellite(s) at 54 W.L. in AOR-W and (3) INMARSAT Ltd.-3 satellite(s) at 178 E.L. in POR. In January 2006, Inmarsat relocated Inmarsat 3F4 from 54° W.L. to 142° W.L. and migrated certain operations to Inmarsat 4F2 at 52.75° W.L., including part of Honeywell's Mini-M Aero operations that had been in communication with Inmarsat 3F4 (Honeywell's Mini-M Aero system, while not currently communicating with Inmarsat 3F4 at 142° W.L., continues to communicate with the other points of communication listed on the license). Honeywell determined that its Mini-M Aero system required no hardware or software modifications as a result of the migration to Inmarsat 4F2 and its devices seamlessly migrated to the new satellite. Call Sign E000156 is the only earth station license held by Honeywell and, because no equipment modifications were required, Honeywell believed that it need not modify its license. However, Honeywell now has been advised by the Commission that its license for Call Sign E000156 lists points of communication, including Inmarsat 3F4, and that such points required updating as a result of Inmarsat migrating the satellite communications. Honeywell has filed an application to modify the license on a permanent basis by adding Inmarsat 4F2 as a point of communication.¹ Given the need for the ongoing communications services provided by the Mini-M Aero system, Honeywell respectfully requests the immediate grant of a STA for a sixty day period.

Pursuant to Section 1.3 of the Commission's rules, Honeywell requests a waiver of Section 25.120(a) and such other Commission rules as may be necessary to permit grant of the requested STA and continued operations with Inmarsat 4F2, including 47 C.F.R. §§ 25.102, 25.117. As the Commission is aware, a multitude of operations, including other Mini-M operations, were migrated from Inmarsat 3F4 to Inmarsat 4F2 and the Commission has granted

¹ See File No. SES-MFS-20080616-00785. Honeywell does not request any temporary authority with respect to the other points of communications listed on its license, or with the authority to receive transmissions as noted on the license. Honeywell is seeking additional information from Inmarsat regarding its future plans for the satellite communications of Honeywell's Mini-M Aero service and will include other points of communications in the request for modification that Inmarsat advises should be included.

both special and permanent authority for those operations.² The operation of Honeywell's Mini-M Aero system has not caused interference to any party. As stated above, Honeywell made no modifications to the METs authorized under its license. Inmarsat has informed the Commission that Inmarsat I4 can and will be operated in the same technical envelope as Inmarsat I3.³ Honeywell does not seek to provide new services, add METs or frequencies or expand the license in any other way under this STA request, and seeks only to conform the license to reflect the migration of the services by Inmarsat to Inmarsat 4F2.

Parties other than Honeywell are directly affected by this instant request. As mentioned above, there are approximately one hundred users of the service under the license who rely on the service to communicate with third parties while in transit. Furthermore, those users have contracted in some cases with third party telecommunications service providers who are also affected by the instant request. Finally, Honeywell is concerned that the customers would find it time-consuming, difficult and costly to immediately replace the capabilities of the Mini-M Aero system. This is particularly true as new equipment and service contracts would have to be ordered and installed, taking into consideration complexities and delays arising from FAA requirements for aircraft installations, with the aircraft taken out of service during that time. Thus, the grant of the requested STA will serve the public interest by allowing Honeywell to continue to serve customers who rely on Honeywell's devices while Honeywell seeks grant of permanent authority.⁴

² See, e.g., Satellite Communications Services Information, Actions Taken, *Public Notice*, Report No. SES-00788 (rel. Jan. 25, 2006) (listing grants of STAs to permit applicants to communicate with Inmarsat 4F2) and licenses for Call Signs E030055 and E020074 (reflecting permanent authority to communicate with Inmarsat 4F2 for licensees whose operations were migrated from Inmarsat 3F4 to 4F2).

³ See, e.g., Consolidated Response of Inmarsat Ventures Limited, File Nos. SES-STA-20051216-01756 *et al.* at 5-6 (filed Jan. 6, 2006).

⁴ See In the Matter of Amtech Systems, LLC, Application for Modification to Extend Term of Earth Station Authorization, File No. SES-MOD-20060614-01011, rel. Jan 26., 2007 (granting waiver to allow applicant to serve its customers while migrating to conforming uses).