

Troy F. Tanner  
 Direct Phone: 202.373.6560  
 Direct Fax: 202.373.6001  
 troy.tanner@bingham.com

September 18, 2008

FILED/ACCEPTED

SEP 18 2008

**VIA HAND DELIVERY**

Federal Communications Commission  
 Office of the Secretary

Marlene H. Dortch, Secretary  
 Federal Communications Commission  
 445 12th Street, S.W.  
 Washington, DC 20554

**Re: NewCom International, Inc., Request for Special Temporary  
 Authority  
SES-STA-20080620-00833 - Supplemental Exhibit**

Dear Ms. Dortch:

On June 20, 2008, NewCom filed a modification application (“Application”) to add the Express 3A satellite positioned at 11.0 degrees west longitude as a point of communication to Call Sign E050018.<sup>1</sup> A concurrent request for special temporary authority (“STA”) was filed seeking permission for NewCom to communicate with the Express 3A during the pendency of the Application.<sup>2</sup> Subsequent events have dramatically degraded the performance of the Express 3A and made grant of the aforementioned STA urgent. Specifically, on August 28, 2008, the Russian Satellite Communications Company (“RSCC”) informed NewCom that north-south station keeping maneuvers had ceased, and the Express 3A would operate from inclined orbit until a replacement space station arrives.<sup>3</sup> The abrupt transition into inclined orbit immediately impaired NewCom’s ability to provide uninterrupted lifeline services to remote end users in West Africa already communicating with ground station facilities licensed under Call Sign E040267.<sup>4</sup>

<sup>1</sup> See File No. SES-MOD-20080620-00832.

<sup>2</sup> See File No. SES-STA-20080620-00833.

<sup>3</sup> A replacement space station is expected to arrive at 11.0 degrees west longitude in Q1 2009.

<sup>4</sup> NewCom was granted STA to communicate with the Express 3A using an antenna licensed under Call Sign E040267 on January 19, 2005 (FCC File No. SES-STA-20050112-00038), and this STA has been extended nine times (FCC File Nos. SES-STA-20050209-00164, SES-STA-20050812-01098, SES-STA-20060222-00288, SES-STA-20060324-00506, SES-STA-20061006-01821, SES-STA-20061206-02102, SES-STA-20070516-00665, SES-STA-20071121-01609 and SES-STA-20080605-00709), with the current STA set to expire on December 10, 2008.

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Bingham McCutchen LLP  
 2020 K Street NW  
 Washington, DC  
 20006-1806

T 202.373.6000  
 F 202.373.6001  
 bingham.com

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NewCom's existing customers in West Africa were not prepared to track an inclined satellite. Many customers operate antennas that require manual adjustment of azimuth and elevation, and have been unable to retrofit their terminals with motorized tracking systems. When the now inclined Express 3A drifts outside its optimal station kept orbital position, these customers experience a significant drop in signal strength that degrades or altogether disrupts their space-to-earth communications. Establishing a second uplink to the Express 3A using the 4.5 meter antenna and extended C-band frequencies proposed in the request for STA will permit NewCom to spread its West African satellite carriers over an additional two transponders. The use of additional transponder capacity will enable NewCom to operate with higher output levels that will increase the downlink signal strength for our West African customers and dramatically improve service during periods of maximum degradation when the Express 3A drifts significantly outside its optimal orbital position.

In light of the RSCC decision to cease station keeping maneuvers, NewCom urges the Commission to conclude its review and grant the requested STA. Grant of STA serves the public interest by enabling NewCom to restore lifeline communications, including telemedicine applications, to existing customers that are experiencing intermittent degradation or complete disruption of service. Pursuant to Section 25.120(b)(3) of the Commission's Rules, a 60 day STA is requested.

Very truly yours,



Troy F. Tanner  
Danielle C. Burt

cc: Jaime Dickinson (NewCom)