



LEVENTHAL SENTER & LERMAN PLLC

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DAVID S. KEIR
(202) 416-6742

E-MAIL
DKEIR@LSL-LAW.COM

BY HAND

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

**Re: Application of Row 44, Inc. for Special Temporary Authority
(File No. SES-STA-20080711-00928; Call Sign E080100)**

Dear Ms. Dortch:

Row 44, Inc. ("Row 44"), by counsel, hereby submits additional information in connection with its request for limited special temporary authority ("STA"). In the above-referenced STA application, Row 44 seeks permission beginning tomorrow, August 1, 2008, to conduct tests employing up to twelve (12) aircraft Earth station ("AES") antennas operating in the 14.05-14.47 GHz transmit and 11.7-12.2 GHz receive bands. The company has sought a permanent aeronautical mobile satellite service ("AMSS") blanket license in pending application File No. SES-LIC-20080508-00570.

This letter is being submitted to provide the FCC with some additional information concerning the scheduling factors underpinning its request for authority commencing tomorrow, August 1. As noted in the Explanatory Statement included in the application, both Alaska Airlines ("Alaska") and Southwest Airlines ("Southwest") have contracted with Row 44 for provision of AMSS service. Each company desires to conduct tests that will provide a demonstration of service quality and availability for the in-flight broadband service and permit them to evaluate such matters as passenger uptake and service usage rates. The first of these tests is scheduled to begin on or about September 1, 2008.

In advance of these market and service tests, Row 44 needs to conduct its own benchmark technical trials, which it currently plans to begin during the week of August 11, 2008, approximately three weeks before the airline service tests. This testing of antenna performance would involve the operation initially of a single antenna onboard a private aircraft flown within the continental U.S. and communicating at various times via the three geostationary satellites



Ms. Marlene Dortch
July 31, 2008
Page -2-

identified in Row 44's application (AMC-9 at 83° W.L., AMC-2 at 101° W.L. and Horizons-1 at 127° W.L.). All communications would be routed through Hughes Network Systems' North Las Vegas Hub Earth station (Call Sign E940460). Antenna performance will be carefully monitored to ensure that the AES terminals are fully compliant with the FCC's rules and operating within the scope of the coordination agreements covering adjacent satellites (thereby causing no harmful interference). This will allow Row 44 to evaluate the overall availability and data transmission rates of the service.

In order to commence in-flight testing during the week of August 11th, Row 44 requires sufficient lead time to plan and execute the installation of the onboard antenna, modem, server and control equipment during the immediately preceding week of August 4, 2008. Working backwards, an approval on August 1, 2008 is reasonably calculated to meet this timetable.

Row 44 is, of course, aware that a single Petition to Deny has been filed with respect to the underlying application upon which the STA request is premised. Row 44 does not believe that the petition poses any impediment to grant of the requested STA. *See* STA Application, Explanatory Statement at 2.

Should there be any questions regarding this matter, please contact the undersigned counsel.

Respectfully submitted,

David S. Keir

Counsel to Row 44, Inc.

cc: Karl Kensinger, FCC
Andrea Kelly, FCC
Scott Kotler, FCC
John Janka, Counsel to ViaSat