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September 13, 2012

VIA ELECTRONIC FILING

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Application of Panasonic Avionics Corporation for Special Temporary Authority, File No. SES-STA-INTR2012-02135, Call Sign E100089

Dear Ms. Dortch:

Panasonic Avionics Corporation ("Panasonic"), pursuant to Section 1.65 of the Commission's Rules, 47 C.F.R. § 1.65, hereby submits this letter to clarify certain information relating to the above-referenced application for special temporary authority ("STA").

Although filed concurrently with an application to modify Panasonic's aeronautical mobile-satellite service ("AMSS") license Call Sign E100089, the FCC Form 312 associated with the STA application does not include the file number of the modification application because it was not available at the time of the STA filing. For the record, the response to Question 3 on the Form 312 should read: "File No. SES-MFS-20120913-00818 (IBFS Submission No. IB2012002134)" so that the STA application can be associated with the modification application for license Call Sign E100089.

In addition, in the context of an STA application, there is no opportunity to separately complete Schedule B of Form 312 and instead the Commission must refer to the technical information set forth in the STA application itself (narrative and attachments) and Schedule B of the associated modification application. In this case, the Schedule B of Form 312 of the modification application includes technical parameters – most importantly maximum transmit power spectral density levels -- associated with worldwide operation of Panasonic's AMSS system, including in regions with greater than two-degree orbital spacing.

For avoidance of doubt, as indicated in the Technical Appendix filed with the STA application, the maximum EIRP spectral density associated with interim operations in the United States is 16.3 dBW/4 kHz (36.5 dBW EIRP) for the narrowest 500KG7D carrier (*see* STA Attachment 1, Technical Appendix at 7). This value is well below the power level coordinated for the Galaxy 17 satellite used for U.S. operations (*see* STA Attachment 3, Coordination Information) and is fully compliant with the Commission's two-degree spacing policies and analogous off-axis EIRP spectral density levels for other mobile Ku-band services (*see, e.g.*, 47 C.F.R. §§ 25.222, 25.226).

Please feel free to contact the undersigned with any questions you may have or if Panasonic can provide any additional information to facilitate expeditious action on its STA application.

Respectfully submitted,

Squire Sanders (US) LLP

/s/ Carlos M. Nalda

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Carlos M. Nalda
Counsel to Panasonic Avionics Corporation

cc: Paul Blais, FCC International Bureau