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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

701 Pennsylvania Avenue, N W
Washington, D.C 20004
202 434 7300
202 434 7400 fax
www mintz.com

Russell H. Fox

Direct dial 202 434 7483
rfox@mintz.com

January 16, 2004

BY HAND AND/OR ELECTRONICALLY, AS NOTED

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

Re: DA 03-3585, RM-10821; Wireless Telecommunications Bureau Seeks Comment On MariTEL, Inc. Petition for Declaratory Ruling and National Telecommunications and Information Administration Petition for Rulemaking Regarding the Use of MariTime VHF Channels 87B and 88B; NOTICE OF EX PARTE PRESENTATION; Filed By Hand and Electronically

PR Docket No. 92-257; Amendment of the Commission's Rules Concerning Maritime Communications; NOTICE OF EX PARTE PRESENTATION; Filed Electronically

ET RM-10743; Commission's Rules to Promote the Use of VHF Public Coast Station Frequencies; NOTICE OF EX PARTE PRESENTATION; Filed Electronically

DA 03-1484; MARITEL, Inc. Request to Extend Construction Deadline for Certain VHF Public Coast Station Geographic Area Licenses; NOTICE OF EX PARTE PRESENTATION; Filed by Hand

Dear Ms. Dortch:

Pursuant to the provisions of Section 1.1206(b) of the rules and regulations of the Federal Communications Commission ("FCC"), this letter provides notice of a meeting between Dan Smith and Jason Smith of MariTEL, Inc. ("MariTEL"), their undersigned counsel and Catherine Seidel, Scot Stone, Jeffrey Tobias and Tim Maguire, all of the Wireless Telecommunications Bureau.

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At the meeting, MariTEL officials explained their plans to provide a data communications service on the VHF Public Coast ("VPC") channels for which MariTEL is licensed. They explained that harmful interference caused by the proliferation of currently approved automatic identification system ("AIS") devices would prevent MariTEL from successfully introducing its service and would effectively reduce the frequencies, purchased by MariTEL, available to it. MariTEL proposed means by which these matters, and those regarding the request by the United States Coast Guard ("USCG") to dedicate channels 87B and 88B for AIS, could be solved. It stated that it would provide a more complete version of its proposal shortly. MariTEL also noted that that although the FCC recently approved its request for extension of time to construct its facilities, it could not effectively do so until matters related to its authorized spectrum, had been resolved. A copy of a presentation made to FCC officials at the meeting is attached.

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

Cordially yours,

Russell H. Fox

Attachment

cc: (each electronically, w/attachment)
Catherine Seidel
Scot Stone
Jeffrey Tobias
Tim Maguire

MariTEL

Marine VHF Data Discussi

January 15, 2004

MariTEL Company

Opportunity Per FCC 80.3

MariTEL Commercial Opportunity:

Use VPC channels to provide AIS based network services in non-PAWSS areas for port authorities, local governments, etc., to facilitate "voiceless" maritime communications.

Use channels 87 and 88 to communicate with SOLAS vessels carrying AIS transponders

Bundle these and other services with traditional voice and/or data VPC services on a CMRS or PMRS basis.

Hypothetical implementation of FCC 80.371: up to (2) narrowband offset duplex channels

Basis of VPC Auction... "Ground Rules"

Up to (2) narrowband offset duplex channels used only in USCG PAWSS VTS operations for ship-shore and shore-ship transmissions (*nationwide ship-ship uses 2288*) to actively manage the flow of vessels in narrow and congested navigable waterways.

MariTEL

Mobile Data Devi

- 12.5 kHz or 25 kHz channel spacing
- Up to 22 kbps
- USB and RS-232 Serial Port for easy networking
- Selective ID and Broadcasting Addressing
- 1 to 6 Watts
- Less than 15 ms transmitter attack time
- On board RAM for "seemingly" faster throughput

Not an experiment

rfneulink

MariTEL Communications Company

Product Segmentation

	VHF	Cellular: GOM Analog	Cellular: 2.5G	Cellular: 3G	Satellite
Maximum Bandwidth	22+ kbps	9.6 kbps	50 kbps	Mbps	100 kbps - Mbps
Integration to Vessel's Bridge	✔✔✔	✔	✔	✔	✔✔✔
Applications					
Vessel telemetry (ex. Engine diagnostics)	✔✔✔		✔	✔	✔✔
Automatic vessel location ("AVL")	✔✔✔		✔	✔	✔✔
Text messaging	✔✔✔	✔	✔✔✔	✔✔✔	✔✔✔
E-mail	✔✔	✔	✔✔✔	✔✔✔	✔✔✔
Low speed web browsing (Eudora)	✔✔		✔✔✔	✔✔✔	✔✔✔
Full speed web browsing (Explorer)			✔	✔✔✔	✔✔✔
Maximum coverage distance	50 mi	30 mi	15 mi	15 mi	N/A
Monthly price range	$15 to $100	$100 to $500	$40 to $150	$40 to $150	$1,000+
Price of customer equipment	$500+	$500+	$100	$100	> $2,000

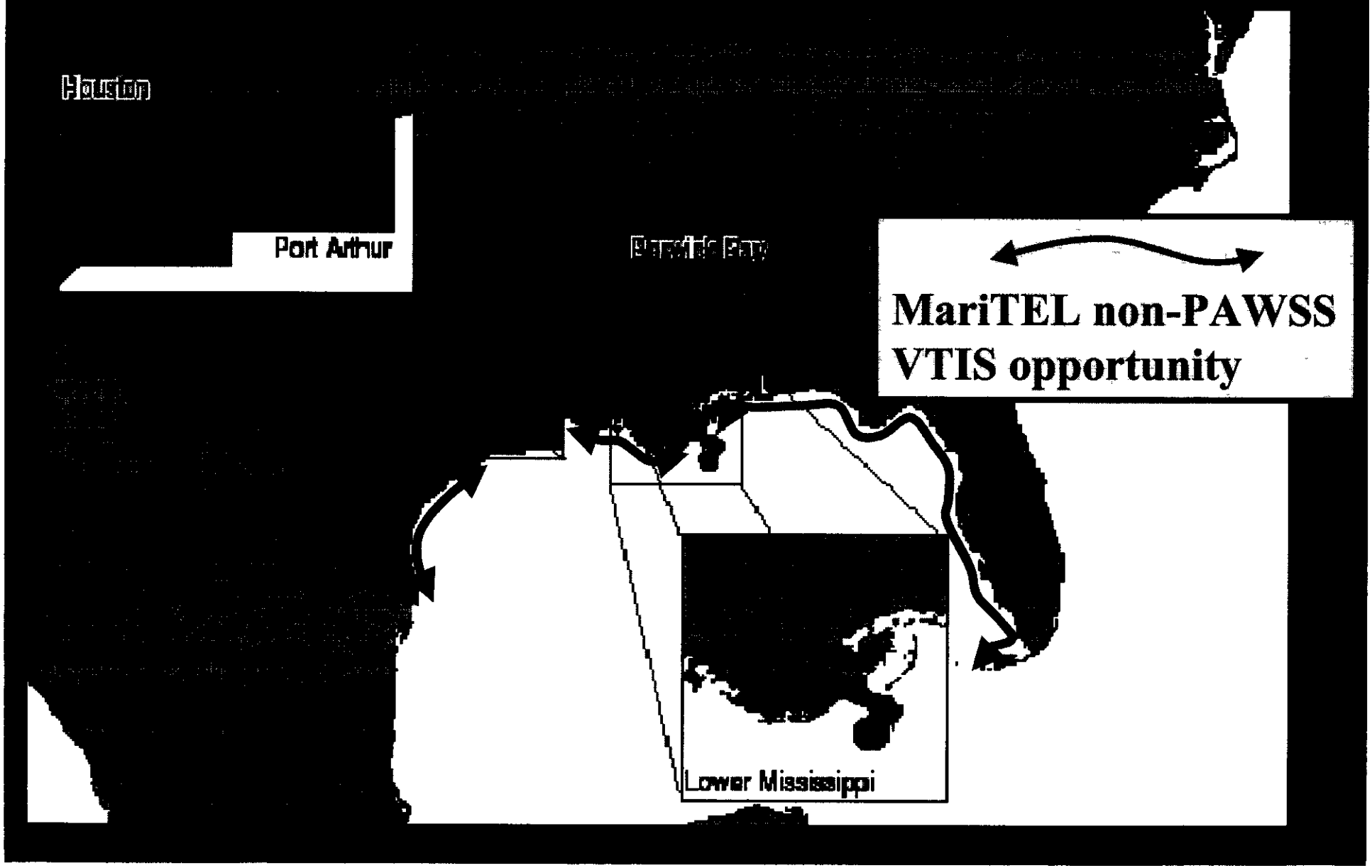
Complimentary to broadband technologies and shorter wavelength spectrum.

MariTEL

Gulf of Mexico ("GOM") Spotli

MariTEL

USCG PAWSS-VTS Ar



MariTEL

GOM Opportu

Non-PAWSS port authorities and stakeholders in need of voice and data maritime communications.

47,000 commercial vessels and over 3,000 off-shore oil platforms in reach of VHF shore stations.

MariTEL

3 Consequences

MariTEL

Bandwi

Before meeting obligations of FCC 80.371

Hypothetical implementation of FCC 80.371: up to (2) narrowband offset **duplex** channels

USCG Request to MariTEL... after the rules were set, narrowband offset **duplex**

MariTEL / USCG Memorandum of Agreement ("MOA")... switch from 87B (simplex) to 487A/B (duplex)

NTIA Petition... as written (wideband simplex on ship station tx side)

NTIA Petition... reality of need for "guard band" spectrum

NTIA / USCG Desire to Take & Warehouse Spectrum

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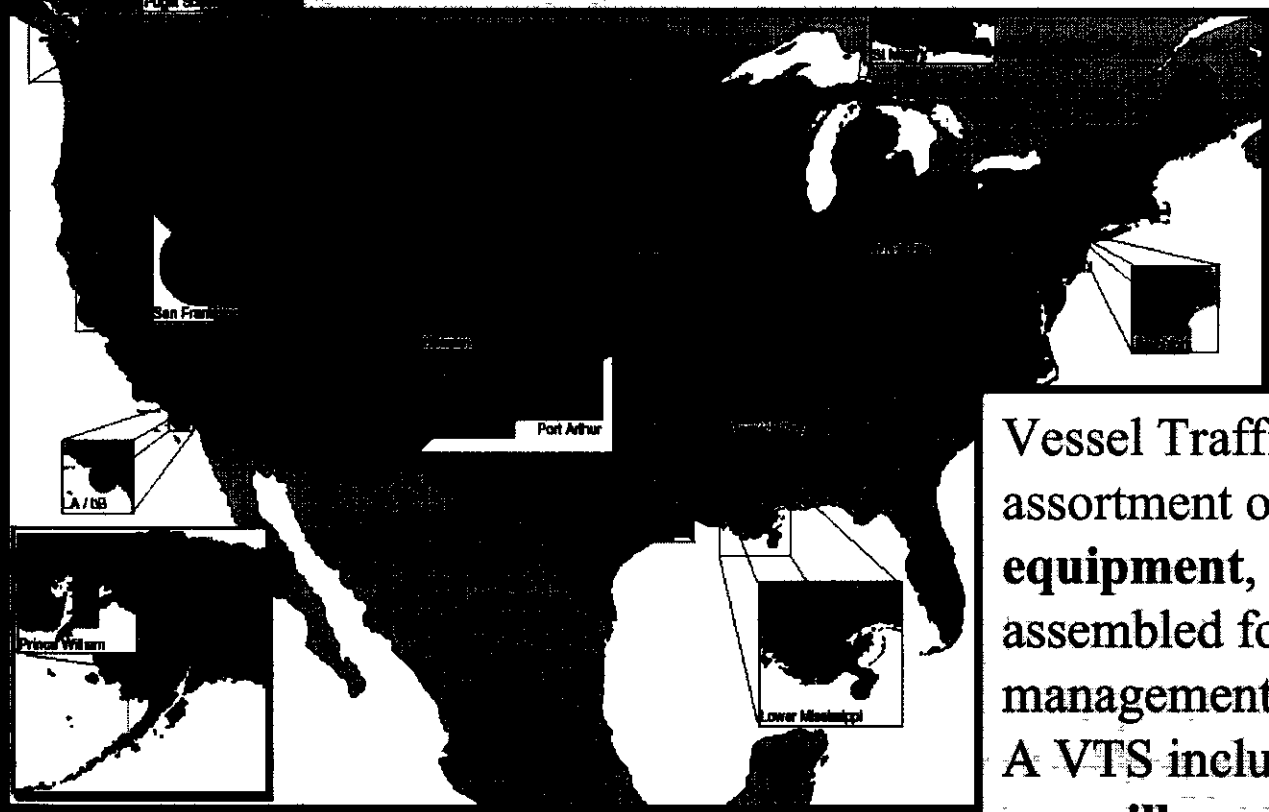
Legend

- MariTEL "wideband" 25 KHz channels
- MariTEL "narrowband" 12.5 KHz channels
- MariTEL channels above Line A
- Narrowband 12.5 KHz duplex channels for PAWSS VTS ship-shore, shore-ship communications
- Channel assigned for use in PAWSS by USCG per Section 80.371 (c)(3)
- Exclusive use of channel by the licensed party; not above/beyond FCC rules
- Designate and PROTECT

MariTEL

Federal vs. Non-Federal

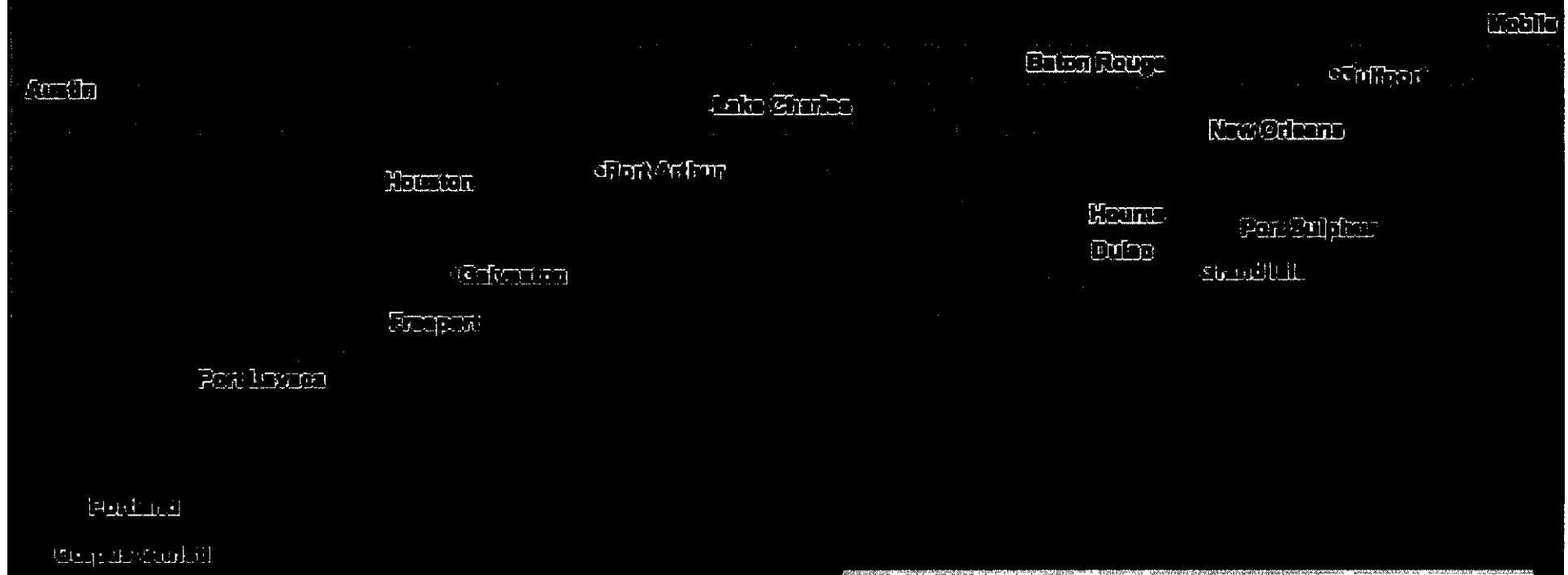
The purpose of a Vessel Traffic Service (VTS) is to provide ***active monitoring*** and navigational advice for vessels in ***particularly confined and busy waterways***.



Vessel Traffic Services (VTS) are the assortment of **personnel, procedures, equipment**, and **regulations** assembled for the purpose of traffic management in a given body of water. A VTS includes some means of **area surveillance, traffic separation, vessel movement reporting**, a **traffic center**, and **enforcement capability**.

MariTEL

AIS to VPC Interference



1. Simplex on B-side… "wrong side of the road"
2. AIS 1371-1 transmitter emissions mask… not acceptable for simplex Part 80 operations
3. AIS 1371-1 "Spike Noise"

"Our experience is that, with the equipment types in use here, the immediate two or three adjacent channels (+/- 100 kHz or so) are not usable when AIS is installed or used at a base station site"… *Karl-Arne Markstrom, Senior Radio Engineer, Telia, operator of Swedish national AIS network, July 23, 2003.*

MariTEL

3. Consequences of [illegible]

Bandwidth

Federal vs. Non-Federal

AIS to VPC Interference

<u>Result</u>: Overturns the VPC auction and eliminates MariTEL's right to use its licensed spectrum.

MariTEL

Solving the Controv

MariTEL / FCC & NTIA Agreem

MariTEL / FCC and NTIA agree to designate channels 87B and 88B for 25 kHz simplex AIS use throughout the major navigable waterways on a ***shared*** government, non-government basis

- No cost to vessel operators for use of spectrum.
- Federal government entities allowed to operate shore stations in all areas for VTS and surveillance applications
- MariTEL allowed to operate shore stations in all areas for non-federal government shore station AIS applications
- NTIA and MariTEL share use of both AIS channels using "time slot allocation" techniques.

The SOTDMA broadcast mode allows the system to be overloaded by 400 to 500% through sharing of slots, and still provide nearly 100% throughput for ships closer than 8 to 10 NM to each other in a ship to ship mode. In the event of system overload, only targets further away will be subject to drop-out, in order to give preference to nearer targets that are a primary concern to ship operators. In practice, the capacity of the system is nearly unlimited, allowing for a great number of ships to be accommodated at the same time.
http://www.navcen.uscg.gov/enav/ais/how_AIS_works.htm

MariTEL Company

Required FCC Action

Remedy 1371-1 AIS interference issues due to current transmitter emissions mask and "spike noise".

Make it illegal for unauthorized shore station transmission ***and*** reception of AIS signals.

Approve MariTEL's PMRS Petition (RM-10743).