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Federal Communications Commission
Office of the Secretary

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



Re: Procedures to Govern the Use of Satellite Earth Stations on Board
Vessels in the 5925-6425 MHz/3700-4200 MHz Bands and 14.0-14.5
GHz/11.7-12.2 GHz Bands
IB Docket No. 02-10

Dear Ms. Dortch:

In March 2005, PanAmSat Corporation ("PanAmSat")¹ filed a Petition for Reconsideration or Clarification of the Report and Order in the above captioned proceeding.² Subsequently, in April and May 2005, both PanAmSat and Intelsat, Ltd. ("Intelsat") filed oppositions and comments, as well as reply comments, in response to petitions for reconsideration in this proceeding. With respect to certain technical issues, the two companies took conflicting positions. Since that time, Intelsat and PanAmSat have merged into a single company. Intelsat files this letter to inform the Commission of the harmonized position it is now taking with respect to the pleadings previously filed by Intelsat and PanAmSat in this docket.

As an initial matter, Intelsat hereby withdraws all comments previously submitted by PanAmSat in the above referenced proceeding.³ As for the comments previously submitted by Intelsat, Intelsat clarifies them as follows.

In its Opposition and Comments, Intelsat had proposed to redefine the reference for the off-axis angle associated with the EIRP density envelope and had specified a corresponding set of off-axis EIRP density limits.⁴ In addition, Intelsat had proposed that such EIRP limits be applicable for off-axis angles

¹ PanAmSat Corporation is now known as Intelsat Corporation.

² *Procedures to Govern the Use of Satellite Earth Stations on Board Vessels in the 5925-6425 MHz/3700-4200 MHz Bands and 14.0-14.5 GHz/11.7-12.2 GHz Bands*, Report and Order, IB Docket No. 02-10, FCC 04-286, rel. Jan. 6, 2005.

³ Specifically, Intelsat is withdrawing the Petition of PanAmSat Corporation for Reconsideration or Clarification (filed Mar. 2, 2005), Partial Opposition and Comments of PanAmSat Corporation (filed Apr. 21, 2005) and Consolidated Reply of PanAmSat Corporation (filed May 4, 2005).

⁴ See Opposition and Comments of Intelsat, Ltd. (filed Apr. 21, 2005) at 18-22.

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starting at 2° .⁵ In its Reply, Intelsat noted that the approach proposed by Boeing did not require redefining the reference for the off-axis angle and indicated that the approach proposed by Boeing was acceptable.⁶ Intelsat hereby confirms that it is not necessary to redefine the reference for the off-axis angle and that the reference should remain the axis of the antenna main lobe.

Furthermore, upon further reflection, Intelsat is of the view that a starting angle of 2° may be too aggressive and now proposes that the starting point for the application of the ESV off-axis EIRP mask be set at 1.5° . As a result, the Intelsat proposal for aggregate off-axis EIRP density masks discussed in Section III, Part C of Intelsat's Opposition and Comments is hereby modified to read as follows:

For C-band ESVs:

26.3-25log(θ)	dBW/4 kHz	For $1.5^\circ \leq \theta \leq 7^\circ$
5.3	dBW/4 kHz	For $7^\circ < \theta \leq 9.2^\circ$
29.3-25log(θ)	dBW/4 kHz	For $9.2^\circ < \theta \leq 48^\circ$
-12.7	dBW/4 kHz	For $48^\circ < \theta \leq 180^\circ$

For Ku-band ESVs:

15-25log(θ)	dBW/4 kHz	For $1.5^\circ \leq \theta \leq 7^\circ$
-6	dBW/4 kHz	For $7^\circ < \theta \leq 9.2^\circ$
18-25log(θ)	dBW/4 kHz	For $9.2^\circ < \theta \leq 48^\circ$
-24	dBW/4 kHz	For $48^\circ < \theta \leq 180^\circ$

Finally, as noted in its Reply Comments,⁷ Intelsat confirms its agreement with Boeing's proposal that mispointing beyond the regulatory limit of $\pm 0.2^\circ$ be compensated by an equivalent tightening of the off-axis EIRP mask.

⁵ See *id.*

⁶ See Reply Comments of Intelsat, Ltd. (filed May 4, 2005) at 5.

⁷ See *id.*

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Please direct any questions regarding the foregoing to Jose Albuquerque,
Senior Director, Regulatory Engineering, at (202) 944-6897.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Jim Ball
Howard Griboff
Paul Locke

CERTIFICATE OF SERVICE

I, Derrick Johnson, do hereby certify that on this 14th day of February 2007, I sent via electronic mail a true and correct copy of the foregoing letter of Intelsat Corporation to the following:

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