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August 16, 2007

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20054

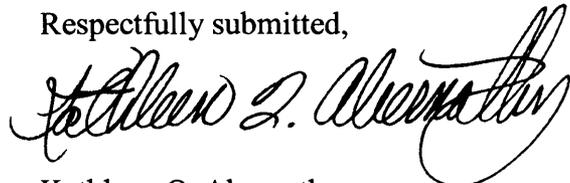
Re: Notice of Ex Parte Meeting, WT Docket No. 07-54

Dear Ms. Dortch:

This is to notify you that on August 15, 2007, on behalf of Mobile Satellite Ventures (“MSV”), the undersigned contacted Commissioner Robert McDowell and his two legal advisors Angela Giancarlo and Cristina Pauze to discuss the above-referenced Docket. I referred to the issues raised in the attached letter and the need to ensure that newly deployed microwave transmitters do not interfere with the operations of MSV's feeder link earth stations.

This letter is filed pursuant to Section 1.1206 of the Commission's rules. Please direct any questions to the undersigned.

Respectfully submitted,



Kathleen Q. Abernathy  
*Counsel for Mobile Satellite Ventures*

Enclosure

cc: Commissioner Robert McDowell  
Cristina Pauze  
Angela Giancarlo

August 13, 2007

The Honorable Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

ALEXANDER H. GOOD  
Chief Executive Officer,  
President and Vice  
Chairman of the Board  
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Re: WT Docket No. 07-54

Dear Chairman Martin:

In the above-referenced docket, the Commission is considering new rules that will promote a proliferation of microwave operations in spectrum that is shared between fixed microwave and Mobile Satellite Service feeder links. In anticipation of the deployment of tens of thousands of new microwave transmitters, Mobile Satellite Ventures, L.P. (MSV) and Terrestar Networks, Inc. (Terrestar), both of which are spending hundreds of millions of dollars to build satellite systems that will include use by public safety, are asking the FCC to adopt clear coordination rules that will protect sensitive satellite signals in the 3 to 5 cities to which the new MSV and Terrestar feeder link operations will be limited.

MSV operates its existing satellite system and is building its next-generation system using feeder links that share spectrum with fixed microwave operations in the 10.7-11.7 GHz band. Microwave operators transmit and receive throughout the band; MSV plans to operate two feeder link facilities in the United States that will only receive satellite signals in the band and will do so in only 500 MHz of the spectrum (specifically in the 10.7-10.95 and 11.2 -11.45 GHz band). MSV's system will be used to provide two-way mobile and broadband service to throughout North America, including to first responders. It also may be used in connection with satellite-enabled 700 MHz public safety radios. As the Commission found in its *Katrina Report* and again just last week in its *700 MHz Order*, satellite service has a unique role to play in providing vital public safety and rural communications. Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks, *Report and Recommendations to the FCC*, at 10-11, 24; *Second Report and Order* in WT Docket No. 06-150, para. 463.

The two MSV earth stations to be located in the United States will each cost more than \$25 million to construct, must be located in an area with skilled labor, sufficient reliable commercial power, and availability of high-capacity broadband telecom links, and cannot be relocated once they are built as the spacecraft design is tied to the gateway location. If MSV experiences interference once it begins operations, there may be no clear way to mitigate the interference and vital public safety communications would be adversely affected.

We do not object *per se* to the proliferation of additional microwave facilities in this shared band or to the specifics of the Fibertower proposal as it would apply throughout virtually the entire country. We are concerned, however, that the existing informal coordination process for sharing between microwave and satellite operations is inadequate to protect highly-sensitive satellite operations in the band. This problem is likely to be much worse in the near future if the Fibertower proposal to allow the use of smaller microwave stations is adopted without some minimal interference protections for the feeder links of the mobile satellite service by the Commission. More specifically, MSV has proposed that the FCC:

- codify the coordination standards and procedures for new microwave operations in the vicinity of MSS feeder link earth stations

- establish a PFD limit of -162 dBW/MHz in band and -125 dBW/MHz out-of-band to protect sensitive satellite feeder link receivers
- clarify that the limit applies to aggregate interference and not just single-entry interference
- provide an opportunity for monitoring if the predictive analysis appears inadequate

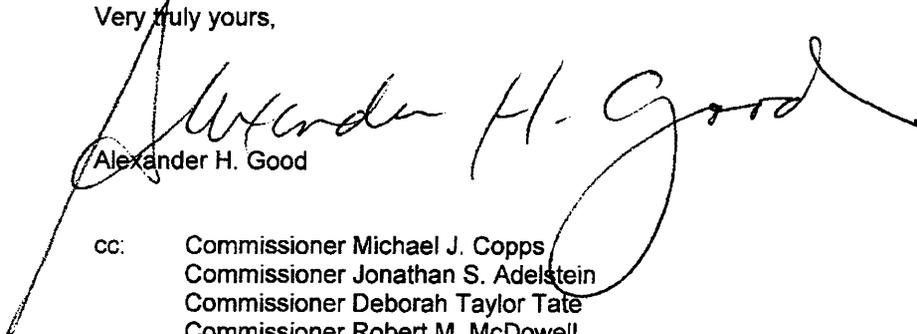
Our proposal should have no practical impact on microwave deployment because:

- there will be no more than 4-5 sites MSS feeder link facilities in the United States (including those anticipated for Terrestrial), so the affected area will be less than 0.1% of the landmass of the United States
- in the small affected area, 500 MHz remains available for virtually unfettered microwave deployment

In fact, we believe that if the microwave community accepted our invitation to meet and discuss these issues, we would be able to agree on an acceptable plan for all parties.

I look forward to discussing this further with you and your staff.

Very truly yours,

  
Alexander H. Good

cc: Commissioner Michael J. Copps  
Commissioner Jonathan S. Adelstein  
Commissioner Deborah Taylor Tate  
Commissioner Robert M. McDowell  
Fred Campbell, Chief, Wireless Telecommunications Bureau  
Helen Domenici, Chief, International Bureau  
Julius Knapp, Chief, Office of Engineering and Technology  
Office of the Secretary  
Mitchell Lazarus, counsel for Fibertower