



Pillsbury
Winthrop
Shaw
Pittman_{LLP}

2300 N Street NW
Washington, DC 20037-1128

Tel 202.663.8000
Fax 202.663.8007
www.pillsburylaw.com

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Bruce Jacobs
202.663.8000
bruce.jacobs@pillsburylaw.com

Via Electronic Filing

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

Re: EX PARTE SUBMISSION
WT Docket 07-54: In the Matter of Amendment of Part 101 of the
Commission's Rules to Modify Antenna Requirements for the 10.7-11.7 GHz
Band

Dear Ms. Dortch:

On August 23, Mobile Satellite Ventures LP (“MSV”) held a meeting with Commission staff from the International Bureau to discuss its position in the above-referenced proceeding. The International Bureau staff were: Karl Kensinger, Kal Krautkramer, Robert Nelson, Frank Peace, and Steven Spaeth. Representing MSV were: Jennifer Manner, Fawad Abbas, and the undersigned. Representing TerrStar were: Doug Brandon and Tom Tycz of Goldberg, Godles, Wiener & Wright.

MSV reiterated its concern with potential aggregate interference to its feeder link earth stations from a proliferation of new microwave facilities in the band and its expectation that it should be possible to find a solution to the problem that does not adversely impact substantially greater use of the band by new fixed service deployments. This issue was raised by the Commission in the Notice of Proposed Rulemaking, paragraphs 22-23. MSV distributed the attached, which provides greater detail regarding the levels of protection that it requires and discusses the results of a study conducted by Comsearch demonstrating that aggregate interference is already a problem in some markets.

Please contact the undersigned with any questions.

Very truly yours,

/s/

Bruce D. Jacobs

Cc: Karl Kensinger
Kal Krautkramer
Robert Nelson
Frank Peace
Steven Spaeth

Interference Limits for MSV's Return Feeder Link

IN-BAND INTERFERENCE:

Technical Specifications of Gateway Front End:

G/T = 38 dB/K

G = 60 dBi

T = 160°K (22 dBK)

$N_0 = -206.6$ dBW/Hz

An in-band interference level of -150 dBW/MHz increases the noise floor by 45%. **-155 dBW/MHz** ($\Delta T/T = 11.25\%$ or 0.45 dB noise floor increase) provide a 5 dB safeguard against errors in predictive modeling

OUT-OF-BAND INTERFERENCE:

Based on inputs provided to MSV by SED Systems, an Out-of-Band Interference level of -115 dBW/MHz generates intermodulation interference that degrades the gateway receiver noise floor by 6%. **-120 dBW/MHz** provides a 5 dB safeguard against errors in predictive modeling.

STUDY CONDUCTED BY COMSEARCH FOR MSV's HOUSTON SITE:

- Found 59 interference sources
- 19 of the 59 exceeded the threshold of -156 dBW/MHz
- All 59 were in 500 MHz band that will be used by MSV
- At least 3 of the 19 that exceeded the threshold were co-channel

Fixed Wireless Interferers Above -156 dBW/MHz Threshold

