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BY ELECTRONIC FILING

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

Re: *Ex Parte* Filing: IB Docket No. 02-54

Dear Ms. Dortch:

On October 28, representatives from the Satellite Industry Association and a number of satellite operators, manufacturers, and service providers (the "Satellite Parties") met with Robert Nelson, Karl Kensinger, Stephen Duall, and Sankar Persaud of the International Bureau to discuss matters relating to the above-captioned proceeding. The discussion focused on the inability of a number of spacecraft models currently in use to comply fully with the requirements in 47 C.F.R. § 25.283(c) to vent excess propellant and relieve pressure vessels at the end of a satellite's life. The Satellite Parties proposed that the Commission grant a blanket waiver of Section 25.283(c) for in orbit satellites that cannot fully comply with the rule. In addition, the Satellite Parties sought clarifications regarding the scope and applicability of the rule going forward. The attached document was distributed to the attendees at the meeting.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

/s/ Karis A. Hastings

Karis A. Hastings
Counsel to SES Americom, Inc.

cc: Robert Nelson
Karl Kensinger
Stephen Duall
Sankar Persaud

SIA Matrix of Current Spacecraft Models Recommended for Blanket Waiver from Requirement to Completely Vent Excess Propellant and Relieve Pressure Vessels at End of Life

Model	**Design**	**U.S.-Licensed Satellites**
Boeing 601, 601HP and 702 models	The pressurant for the vessels that are used during orbit raising was permanently isolated from the propulsion system by firing a pyrotechnic valve at beginning of on-orbit life such that the residual gas (about 5%) cannot be vented at end of life.	Includes AMSC-1/ MSAT-2; DIRECTV 1R, 4S, 10, 11 & 12 (to be launched Dec. 2009); Galaxy 3C & 11; Intelsat 1R, 2, 3R, 4, 5, 6B, 9 & 10; Spaceway 1, 2 & 3; XM-1, 2, 3 & 4
Lockheed Martin A2100 and 7000 models	Oxidizer tanks were sealed by firing a pyrotechnic valve following transfer orbit. Remaining oxidizer (less than 3% of tank volume) cannot be vented at end of life.	AMC-1, 2, 3, 4, 6, 7, 8, 10, 11, 15 & 16; EchoStar 3, 4, 7, 10 & 12; Intelsat 801, 802 & 805
Orbital Sciences Star and Star 2 models	Oxidizer tanks were sealed by firing a pyrotechnic valve following transfer orbit. Remaining oxidizer (less than 3% of tank volume) cannot be vented at end of life.	Galaxy 14 & 15; Waivers granted previously for Intelsat 11, Galaxy 12 & Horizons 2
Thales Alenia (formerly Alcatel) Spacebus 2000, 3000 and 4000 models	Helium tanks were sealed by firing a pyrotechnic valve following transfer orbit. Remaining helium cannot be vented at end of life.	AMC-5, 9 & 12; Galaxy 17; GE-23
EADS Astrium Eurostar 3000	Helium tanks were sealed by firing a pyrotechnic valve following transfer orbit. Remaining helium cannot be vented at end of life.	Intelsat 10-02