

John Kennedy

From: Suzanne Hutchings Malloy [suzanne.h.malloy@ico.com]
Sent: Monday, January 29, 2007 5:29 PM
To: John Kennedy
Subject: RE: Request for Expedited Processing: 0798-EX-ST-2006, 0881-EX-ST-2006

Mr. Kennedy:

SES Americom has a pending request for an experimental STA to resume and complete the testing of the ICO Global Communications F-2 satellite begun in 2001 from the SES Americom Brewster, Washington earth station facilities; the SES Americom Brewster fixed earth station would also conduct tests with an experimental mobile terminal operated by ICO Global Communications ("ICO") as a separate point of communication. SES Americom seeks authorization for in-orbit testing and end-to-end testing, using multiple test carriers at frequencies in the 5 GHz feeder uplink band (5186–5212 MHz) and transmit signals from the Brewster SAN in a portion of the 2 GHz MSS bands (2000-2015 MHz) (File No. 0798-EX-ST-2006). ICO requests special temporary authority to use the same frequencies to conduct similar tests, in conjunction with the tests proposed under the SES Americom request, using an ICO-owned experimental mobile terminal as a separate point of communication (File No. 0881-EX-ST-2006).

SES Americom and ICO seek to conduct these tests as soon as possible, or specifically, to begin the tests in the latter half of February 2007 (February 19) and to complete them within three months (by May 19). ICO must complete tests within that time frame in order to release resources and personnel to prepare for the late 2007 launch of a geostationary satellite that will serve the United States using [the same](#) 2 GHz frequencies proposed for use in the above-referenced tests. Preparation for testing of the geostationary satellite will begin no later than June 2007; ICO personnel dedicated to the above-referenced tests must complete that work in a timely fashion in order to focus on preparation for the upcoming ICO satellite launch. Results gleaned from these tests are essential to ICO's efforts to develop ICO user terminals that are interoperable with its North America and global MSS systems, and to facilitate future launch and operation outside of the United States of the larger ICO MEO constellation. Due to the imminent launch of the ICO geostationary satellites for use in the same 2 GHz frequencies, this window of time will be the only opportunity that the parties will have to access these frequencies for experimental testing purposes at the Brewster facility.

ICO's proposed tests at Brewster are a key test-bed for 2 GHz band frequency use; without these tests, ICO will lose its only advance opportunity to test satellite propagation models and antenna technology in North America prior to launch of the ICO geostationary satellite in late 2007. ICO will use the experimental data on 2 GHz frequency band characteristics to speed development of equipment and services to be provided by the geostationary satellite. The data will also provide invaluable information for clearing spectrum in advance of launch of the geostationary satellite. Specifically, the tests will help validate key assumptions in the land mobile satellite propagation models for the particular applications the ICO geostationary satellite will deploy in the 2 GHz frequency band, and will allow ICO to validate antenna performance in the 2 GHz frequency band. This data will be used to help refine equipment and service development in advance of launch of the ICO geostationary satellite. The data is therefore essential to the effective and efficient deployment of the ICO geostationary satellite. ICO has spent tens of thousands of dollars to date to set up tests for Brewster; those sums would be largely wasted if ICO were unable to access the Brewster facilities in a timely fashion. For these reasons, time is of the essence in granting the pending applications.

Each component of the tests using the indicated frequency bands will be of very brief duration. The in-orbit testing at the Brewster earth station facility can be completed within weeks of initiating the tests. The end-to-end "loop back" tests described in that application can be completed within several days of initiating the tests. Related tests under the separate experimental application filed by ICO, using an experimental mobile terminal, would be similarly limited in duration. Expedited processing is also warranted in light of the fact that similar tests at the Brewster location have been authorized previously under special temporary authority, and use of the frequencies for the current test have been fully coordinated with potentially affected parties, including the Federal Aviation Administration and Globalstar, Inc.

Thank you for your attention to this matter.

2/1/2007

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