



Federal Communications Commission  
Washington, D.C. 20554

DA 06-276

February 3, 2006

Brian Jones, Esq.  
Qualcomm, Inc.  
5775 Morehouse Drive  
San Diego, CA 92121

Re: Call Sign: E040324  
File No. SES-LIC-20051206-01702

Dear Mr. Jones:

On December 6, 2005, Qualcomm Inc. filed the above-captioned application for authority to operate earth stations on-board vessels (ESV) that would communicate with ALSAT-designated satellites in the conventional Ku-Band.<sup>1</sup> Pursuant to Section 25.112(a)(1) of the Commission's rules, 47 C.F.R. §25.112(a)(1), we dismiss this application as defective.

Specifically, in Form 312 Schedule B, you list the value of the Maximum EIRP Density per Carrier for emission designator 15M0F1D (E47) as -16.9 dBW/4 kHz (E49). This is less than and therefore inconsistent with the maximum value of -12.7 dBW/4 kHz we derive from the bandwidth of the emission and the Maximum EIRP per Carrier value of 23 dBW (E48). In addition, Qualcomm indicated that the Total EIRP for All Carriers is 23 dBW (E40). This value is also inconsistent with the value of 21 dBW Total EIRP for All Carriers we calculate from the 2 watts of the Total Input Power at Antenna Flange (E38), and 18 dBi of the Transmit Gain of the Antenna (E41) you list in the application. Given these inconsistencies, we cannot determine the proposed emission power of your proposed earth stations. Further in Form 312 Schedule B, you did not complete the required Section on Frequency Coordination (Items E51 through E60). Finally, on Form 312, in response to Question 20 (Nature of Service), Qualcomm selected the secondary-allocated Mobile Satellite Service rather than the primary-allocated Fixed Satellite Service for this ESV application. The use of the secondary allocation is inconsistent with indicating ALSAT-designated satellites as a point of communication. We note that the Table of Frequency Allocations, 47 C.F.R. §2.106, permits ESVs to operate in the Fixed Satellite Service.<sup>2</sup>

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<sup>1</sup> 11.7-12.2 and 14.0-14.5 GHz bands.

<sup>2</sup> See footnote NG183 of 47 C.F.R. § 2.106.

Further while not a basis for dismissal, Qualcomm should address the following if it refiles the application. Qualcomm lists several remote control points in Schedule B of Form 312 (Questions E61 through E65). Any refiling should identify which of these remote control points are considered the primary remote control point and which remote control points are considered the backup points. Alternatively, please provide an explanation for the multiple remote control points in the application.

Accordingly, pursuant to Section 25.112(a)(1) of the Commission's rules, 47 C.F.R. §25.112(a)(1), and Section 0.261 of the Commission's rules on delegations of authority, 47 C.F.R. §0.261, we dismiss your application without prejudice to refiling.<sup>3</sup>

Sincerely,

Scott A. Kotler  
Chief, Systems Analysis Branch  
Satellite Division  
International Bureau

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<sup>3</sup> If Qualcomm refiles an application identical to the one dismissed, with the exception of supplying the corrected information, it need not pay an application fee. See 47 C.F.R. Section 1.1109(d).