



Federal Communications Commission
Washington, D.C. 20554

DA 06-774

March 31, 2006

Mr. Alfred Mamlet
Steptoe & Johnson LLP
1330 Connecticut Ave NW
Washington, D.C. 20036-1795

Call Sign: E050292
File No.: SES-LIC-20051018-01424
File No.: SES-STA-20051115-01578

Dear Mr. Mamlet:

On October 18, 2005, Stratos Offshore Services Company (Stratos) filed the above-captioned application seeking a license to operate a network of Ku-Band earth stations on board vessels (ESV) through a previously licensed 6-meter fixed earth station¹ in Scott, Louisiana. Pursuant to Section 25.112(a)(1) of the Commission's rules, 47 C.F.R. § 25.112(a)(1), we dismiss the application and the associated request for special temporary authority (STA) as defective.

Specifically, for Stratos's proposed one-meter ESV antennas (Remote Types #1 and #4), Stratos lists the proposed Maximum EIRP per Carrier (item E48) as 45.8 dBW for emission designator (item E47) 400KG7D. This value is greater than, and therefore inconsistent with, the Total EIRP for All Carriers (item E40), which Stratos indicates is 43.5 dBW. Similarly, for the 2.4 meter ESV antennas (Remote Type #3), Stratos lists the proposed Maximum EIRP per Carrier (item E48) as 52.2 dBW for the following emission designators (item E47): 4M90G7D, 2M80G7D, 2M40G7D, 1M40G7D and 200KG7D. This is greater than the Total EIRP for All Carriers (item E40) which Stratos indicates is 48.6 dBW. Given these inconsistencies, we cannot determine the proposed emission power. As a result, the application is defective, and is therefore dismissed.

While we dismiss the application on the above basis, we take the opportunity to apprise you of other concerns we have should Stratos choose to re-file the application.

First, in Items E57 and E59 of the Schedule B of the application, Stratos lists the minimum antenna elevation angle as 0 degree. Section 25.205 of the Commission's rules, however, states that earth station antennas shall not be authorized for transmission at an angle that is less than 5 degrees measured from the horizontal plane to the direction of the maximum radiation.

Second, Stratos indicates that its proposed 1.0 meter and 1.2 meter antennas meet the off-axis EIRP density limits contained in Sections 25.222(a)(1) through (4) of the Commission's rules, 47

¹ Call Sign E980235

C.F.R. § 25.222(a)(1) through (4). Stratos appears to base this assertion on the assumption that the antennas also comply with the antenna radiation performance standards contained in Section 25.209 of the Commission's rules, 47 C.F.R. § 25.209. The technical showings supplied in other applications for licenses for the same SeaTel 1.0 and 1.2 meter antennas as Stratos proposes to utilize, indicate that the antennas do not satisfy Section 25.209's antenna radiation performance standards between 1.25 and 1.5 degrees. Consequently, Stratos must include, in any refiling, a demonstration of its off-axis EIRP density levels beginning at 1.25 degrees off-axis with 0.1 degree increments out to 2.25 degrees off-axis. The demonstration should include a comparison of the authorized off-axis EIRP density limits specified in Section 25.222(a)(1)-(4) of the Commission's rules.

Finally, in Attachment C of the application, Stratos states that "...the antenna controller can detect within 100 milliseconds a pointing error that exceeds 0.5 degrees and cease transmissions immediately...". Stratos must clarify in any refiling whether the antenna controller can automatically detect and cease transmissions within 100 milliseconds of a pointing error that exceeds 0.5 degrees, in conformance with Section 25.222(a)(7) of the Commission's rules, 47 C.F.R. § 25.222(a)(7).

Accordingly, pursuant to Section 25.112(a)(1)² 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 both applications as defective without prejudice to refiling.

Sincerely,

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

² 47 C.F.R. § 25.112(a)(1). See *also* Echostar Satellite LLC, *Order on Reconsideration*, DA 04-4056 (released December 27, 2004).