



Federal Communications Commission  
Washington, D.C. 20554

DA 13-104

January 25, 2013

Ms. Carolyn Blasko  
Sure Shot Transmissions, Inc.  
P.O. Box 489  
10314 Main Street  
New Middletown, OH 44442-0489

Call Sign: E940167  
File No.: SES-MOD-20120912-00810  
SES-AMD-20130104-00004

Dear Ms. Blasko:

On September 12, 2012, Sure Shot Transmissions, Inc. (Sure Shot) filed the above-captioned applications to modify its current license for a Temporary-Fixed earth station. For the reasons explained below, we dismiss the application without prejudice to refiling.<sup>1</sup>

Section 25.112(a) of the Commission's rules requires the Commission to return, as unacceptable for filing, any earth station application that is not substantially complete, contains internal inconsistencies, or does not substantially comply with the Commission's rules.<sup>2</sup> Sure Shot's application does not comply with the Commission's rules, which renders it unacceptable and subject to dismissal.

The amendment to Sure Shot's modification application, SES-AMD-20130104-00004, incorrectly calculates power levels. Sure Shot lists, in Schedule B of the amendment, for emission designator 36M0F9W (E47), the maximum effective isotropic radiated power (EIRP) as 78.0 dBW (E48) and the maximum EIRP density per carrier as 46.01 dBW/4kHz (E49). Based on a total input power at the antenna flange of 400 W (E38) and a transmit antenna gain of 45.5 dBi (E41), our calculations indicate that the maximum EIRP of emission designator 36M0F9W should be 71.52 dBW, and the maximum EIRP density per carrier should be 31.98 dBW/4kHz.

In addition, although Sure Shot's current authorization for a 3.7-meter antenna includes ALSAT authority, Sure Shot must comply with current rules and policies when replacing the antenna. Current rules and policies stipulate that earth stations may be granted ALSAT as a point of

---

<sup>1</sup> If Sure Shot Transmission, Inc. refiles an application identical to the portion dismissed, with the exception of supplying the corrected information, it need not pay an application fee. *See* 47 C.F.R. § 1.1111(d).

<sup>2</sup> 47 C.F.R. § 25.112(a).

communication only in cases where the earth station is eligible for routine processing.<sup>3</sup> Routine processing under Sections 25.212(c) and 25.211 (d)(2) of the Commission's rules for earth stations in the 14.0-14.5 GHz frequency band requires that the maximum input power density into the antenna be no greater than -14.0 dBW/4kHz for narrowband analog transmissions, narrowband and wideband digital transmissions, and video transmissions, and that the maximum input power into the antenna be no greater than 27 dBW for analog video transmissions.<sup>4</sup> The antenna input power and transmit EIRP values in Sure Shot's application exceeds these values.

Furthermore, when the input power density level exceeds -14.0 dBW/4kHz, Section 25.211(f) of the Commission's rules requires applicants to comply with the procedures set forth in Section 25.220.<sup>5</sup> Those procedures require a demonstration that the earth station complies with the off-axis EIRP density envelopes specified in Section 25.218(d). Applicants must demonstrate such compliance by submitting tables, as defined in Section 25.115(h)(1-4), that show the off-axis EIRP.<sup>6</sup> Sure Shot's application does not comply with the routine licensing rules for ALSAT authority and fails to provide the off-axis-EIRP tables necessary to demonstrate compliance with Section 25.220.

Accordingly, pursuant to Section 25.112(a)(1) and Section 0.261 of the Commission's rules on delegation of authority, 47 C.F.R. § 25.112(a)(1) and 47 C.F.R. § 0.261, we dismiss Sure Shot's applications without prejudice to refile.

Although not a grounds for dismissal, we also note that Sure Shot did not list modulation and services descriptions in Schedule B (E50) for the emission designator 36M0F9W. Sure Shot must provide such information, if it chooses to refile.

Sincerely,

Paul Blais  
Chief, Systems Analysis Branch  
Satellite Division  
International Bureau

---

<sup>3</sup> See Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Services in the United States, IB Docket No. 96-111, First Order on Reconsideration, 15 FCC Red 7207 (1999), at 7213 ¶13 (stating that licenses for "routine" earth stations providing fixed-satellite service in the conventional C-band Ku-band may specify "ALSAT" as authorized points of communication, and noting that a "routine" earth station is one that operates consistently with the technical requirements of Part 25).

<sup>4</sup> 47 C.F.R. § 25.212(c) and 47 C.F.R. § 25.211(d)(2)

<sup>5</sup> 47 C.F.R. § 25.220 and 47 C.F.R. § 25.211(f)

<sup>6</sup> 47 C.F.R. § 25.218(d), 47 C.F.R. § 25.115(h)(1-4), 47 C.F.R. § 25.220.