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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue N.E., Suite 110
Washington, DC 20002

Re: Notice of Ex Parte Presentation in IB Docket No. 02-10

Dear Ms. Dortch:

This letter provides notice that, on April 3, 2003, Robert Hanson, Vice President/Regulatory Affairs of Maritime Telecommunications Network, Inc. ("MTN"), along with Raul Rodriguez and the undersigned of Leventhal, Senter & Lerman P.L.L.C. (attorneys for MTN) met with Bruce A. Romano, Thomas Derenge, and Tom Mooring of the Commission's Office of Engineering and Technology ("OET"). MTN made the presentation in Attachment 1 to this letter, and discussed the licensing and regulatory status of earth stations on board vessels ("ESV") within the C- and Ku-bands – matters under consideration within IB Docket No. 02-10.

At the meeting, the OET personnel present suggested that some form of "soft segmentation" of the current allocations at C-band and Ku-band for ESVs may be able to mitigate potential problems of the use of shared bandwidth. MTN emphasized in response that both C-band and Ku-band frequencies within the FSS are needed for ESV use, and that the vagaries of satellite access and other related concerns would preclude the adoption of any sort of mandatory confinement of ESVs to a particular frequency sub-band at either C-band or Ku-band, per-satellite spectrum limits, or limits on the number of satellites that may be accessed.

MTN emphasized that it has been an extremely good "spectrum citizen" since its inception, and believes that its stellar interference record over the years has earned it the benefit of the doubt from the Commission. MTN remains strongly opposed to unnecessary or arbitrary constraints on ESV use (either at C-band or at Ku-band) that serve only to provide prophylactic

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protection against the fear of widespread interference to the fixed service from ESVs. In this last regard, MTN would prefer to continue to operate on a non-interfering basis at C-band than to try to adjust its operations to fit under a regulatory regime that is unnecessarily restrictive. The establishment of a regulatory regime for ESVs has to provide a win-win outcome – i.e., the fixed service would be assured of receiving adequate protection from ESVs in the fixed-satellite service through coordination and licensure of ESVs, while MTN would secure desirable regulatory certainty (with the attendant operational benefits) as a reasonable trade off for the non-inconsiderable burden of coordination and licensing.

Finally, MTN discussed the ESV agenda item for the 2003 World Radiocommunication Conference, and indicated the importance of having a notice of proposed rule making issued by the Commission prior to the June 9 start of WRC-03.

Pursuant to Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), the original and one copy of this letter, with the attachments, are submitted for inclusion in the file of the above-referenced proceeding.

Please direct any questions you may have to the undersigned.

Respectfully submitted,

Stephen D. Baruch
*Attorney for Maritime Telecommunications
Network, Inc.*

Attachments

cc (w/ attachments): Bruce A. Romano
Thomas Derenge
Tom Mooring

#180439



MTN focuses on providing broadband satellite services for in-motion installations (i.e. cruise vessels, oil/gas rigs, and military vessels)

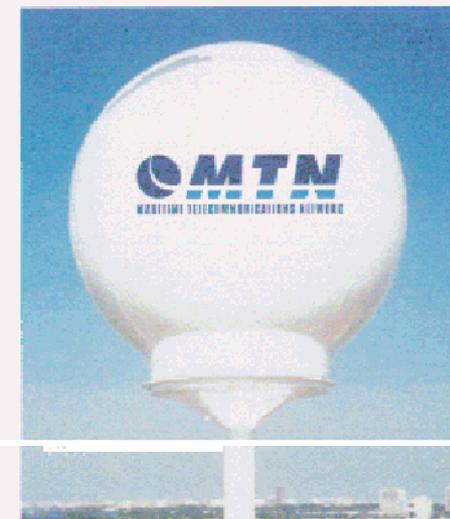
April 3, 2003

Mission Statement

“We are dedicated to providing our maritime customers with state-of-the-art global communications solutions. We are committed to delivering reliable, effective, innovative and economical services that drive improved profitability for our company and our customers.”

What We Do . . .

- **MTN focuses on the Cruise, Oil & Gas, Live Broadcast, and Military markets providing broadband satellite communications services for moving vessels or vehicles**
- **MTN is a full service turn-key provider offering:**
 - **Engineering/System Design**
 - **Equipment Leasing**
 - **Equipment Installation**
 - **Equipment Maintenance & Repair**
 - **Space Segment Management**
 - **Private Terrestrial Networks**
 - **PSTN Termination**
 - **Internet Cafes (Wired & Wireless)**
 - **Prepaid Calling Cards**
 - **Live Broadcasting Services (Audio & Video)**
 - **Full Newspaper delivery anywhere in the world**



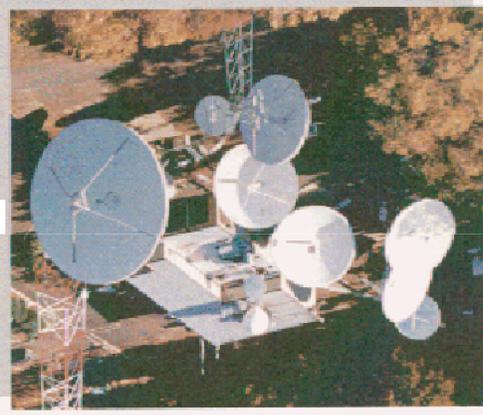
How We Do It...

- Stabilized Antenna Platform on Ships (multiple configurations)

- Routers and Voice Gateways
- Satellite Data Modems

- Majority of Traffic is IP including VoIP

- State-of-the-art Teleport facilities are used to land circuits – network control through Holmdel, N.J. and Miramar, FL
- MTN utilizes commercial FSS satellites (both C-Band and Ku-Band) to provide service (including PanAmSat, Intelsat, New Skies, SES Americom)



MTN ShipNet Diagram

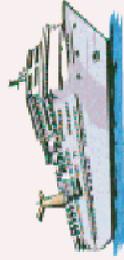
MTN

Network Operating Center
(Miramar, Florida)



MTN

Remote Shipboard Terminals
(ports and navigable waters
throughout the world)



Modem



MTN Router

Corp. Router/LAN

Channel Bank



Internet Server

Ship PBX



FAX



Telephone



Ship Network



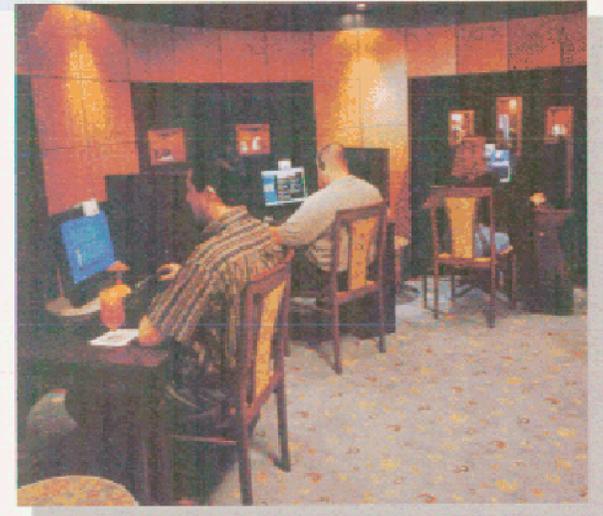
Internet Cafe

MTN's Solid Customer Base



What is Our Value Added . . .

- Our Customers use MTN Services for:
 - Immigration/Customs (Electronic Processing)
 - Inventory Management
 - General Shipboard Administration
 - Communications with HQ
 - Ship Location Tracking
 - Credit Card Verification/ ATM Processing
 - Extensive calling during safety/distress given the volume of calls/e-mails the MTN system can handle versus Inmarsat
 - Passenger and Crew Calling
 - Passenger and Crew Entertainment
 - Via Internet Cafes (wired and WiFi wireless)
 - Daily newspapers (digitally transmitted and printable in complete format)
 - Live video/radio broadcasts



Vital MTN Statistics

- Ships/Rigs Installed → 108
- Ships with Internet Cafes – 50
- Number of Passengers ~150,000 (at any given time)
- Number of Crew Members ~66,000
- Average Cost of an Installation - \$285,000
- Annual Revenues approximately \$35 million
- MTN Employees = 80 +50 onboard managers
- Stand alone privately owned U.S. Corporation

International Regulatory Status

- Final preparations for WRC-03 are now underway.
- Europe, Asia and Americas all agree that ESVs should operate within the FSS in C-band and Ku-band:
 - Common proposals from CEPT, APT, and CITEEL contain similar approaches;
 - CITEEL proposal was developed within the U.S., and was supported by industry and government users.
- Technical coordination guidelines and methodologies for ESVs have been developed in the ITU-R, and are captured in a series of new ITU Recommendations.

International Regulatory Status

- WRC-03 is expected to confirm the regulatory approach developed within the ITU-R.
- The U.S. has, since before WRC-97, assumed the lead role in the development of a stable and mutually satisfactory regulatory environment for ESVs in FSS bands shared on a co-primary basis with the fixed service.

Domestic Regulatory Requirement

The FCC should adopt, **prior** to the start of WRC-03, **an NPRM** on ESVs that complements and helps advance the U.S. ESV Proposals at WRC-03.

The FCC's failure to adopt **an NPRM** on ESVs **well** in advance of WRC-03 could substantially undermine the **ability of** the US to achieve its goals on Agenda Item 1.26.