



LEVENTHAL SENTER & LERMAN PLLC

July 15, 2004

RAUL R. RODRIGUEZ
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RRODRIGUEZ@LSL-LAW.COM**VIA HAND DELIVERY****RECEIVED**Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W., Room TW-B204
Washington, D.C. 20554

JUL 15 2004

Federal Communications Commission
Office of Secretary**Re: Oral Ex Parte Presentation in IB Docket No. 02-10**

Dear Ms. Dortch:

This letter provides notice that, on July 13, 2004, Dr. Robert Hanson, Vice President/Regulatory Affairs of Maritime Telecommunications Network, Inc. ("MTN"), and the undersigned met with Ms. Sheryl J. Wilkerson, Legal Advisor to Chairman Powell, and Ms. Bethany Smocer, Intern in the Office of the Chairman, to discuss matters pertaining to the above-referenced rulemaking proceeding. The participants discussed MTN's positions set out in its Comments and Reply Comments in the referenced proceeding and emphasized the need for the final rules to allow earth stations on vessels to operate in C-band with appropriate coordination with the Fixed Service. The attached document was distributed at the meeting.

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 are submitted for inclusion in the file of the above-referenced proceeding.

Please direct any questions you may have to the undersigned.

Respectfully yours,

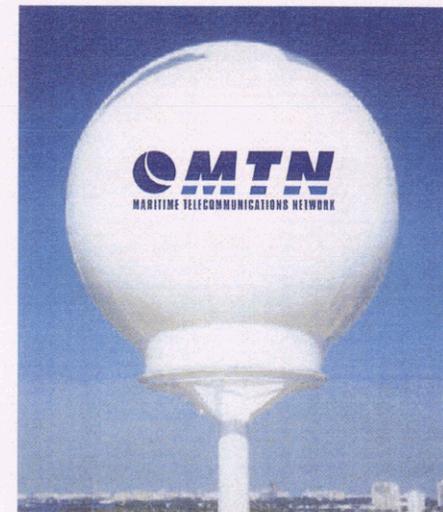
Raul R. Rodriguez
Attorney for Maritime Telecommunications Network, Inc.RRR/rjc
Attachmentcc (by e-mail): Ms. Sheryl J. Wilkerson
Ms. Bethany SmocerNo. of Copies rec'd 0/1
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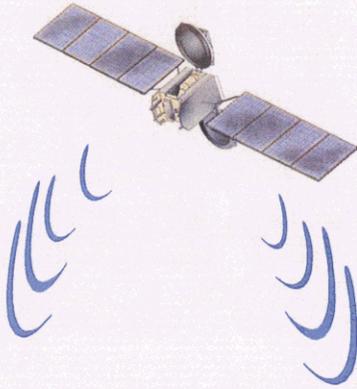
MTN focuses on providing broadband satellite services for cruise vessels, oil/gas rigs, and military vessels.

What We Do . . .

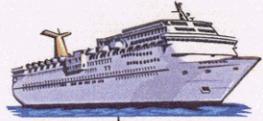
- **MTN focuses on the Cruise, Oil & Gas, Live Broadcast, and Military markets providing broadband satellite communications services for moving vessels or vehicles**
- **MTN is a full service turn-key provider offering:**
 - Engineering/System Design
 - Equipment Leasing
 - Equipment Installation
 - 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



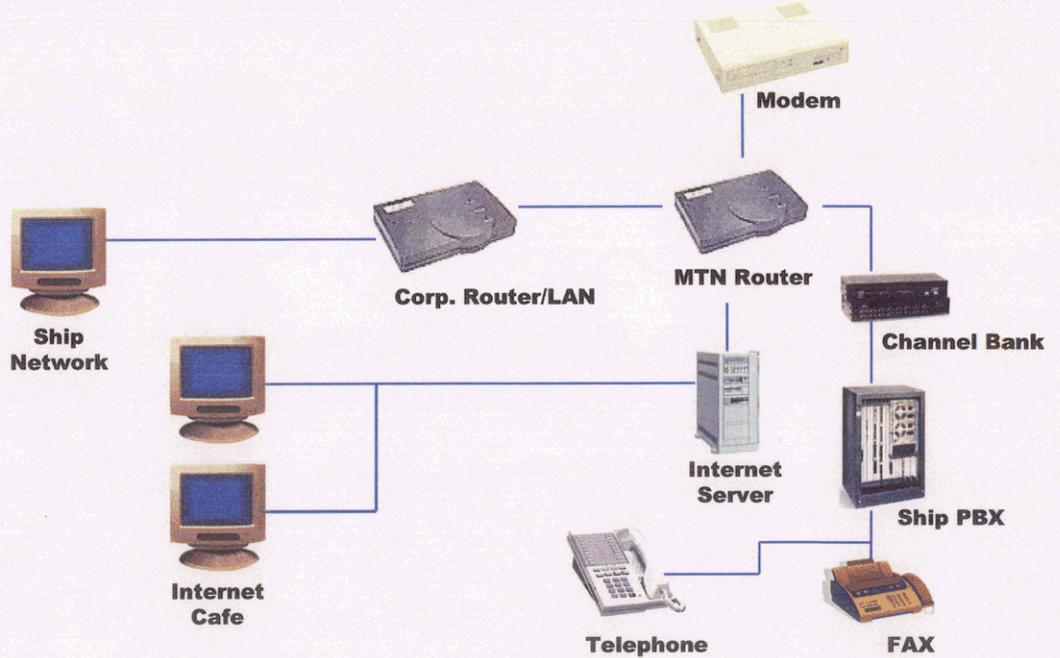
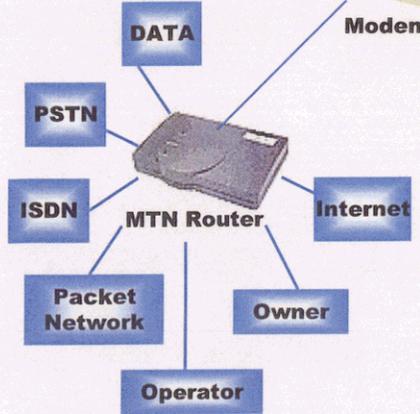
MTN ShipNet Diagram



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

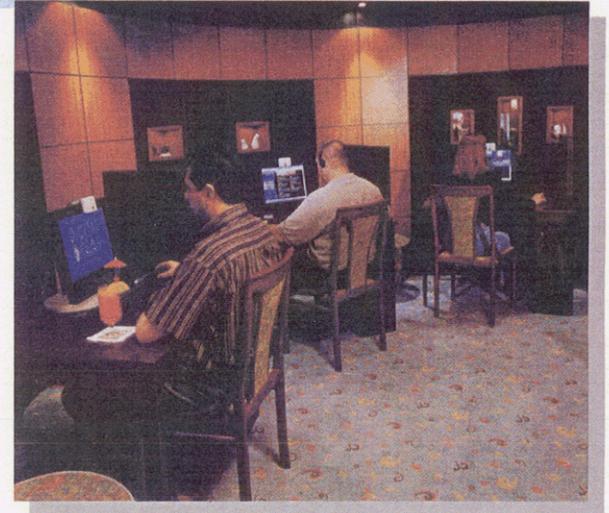


MTN Network Operating Center (Miramar, Florida)



What is Our Value Added ...

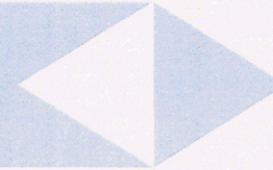
- Our Customers use MTN Services for:
 - Homeland Security
 - Immigration/Customs (Electronic Processing)
 - Inventory Management
 - General Shipboard Administration
 - Communications with HQ
 - Ship Location Tracking
 - Credit Card Verification/ ATM Processing
 - Extensive calling during safety/distress 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 – 140+
- 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

WRC-03 Results



- WRC-03 adopted ESVs as a new application of FSS in both C- and Ku-bands.
- At C-band, ESV is an FSS application co-primary with C-band FS stations.
- The primary motivation for developing ITU technical recommendations was to provide the means for protecting the FS through frequency coordination.

In-Motion vs. Fixed ESVs

- ESVs at fixed locations (e.g., docks; oil exploration platforms) must be coordinated in same manner as any other C-band Earth station and licensed as an FSS earth station as provided for in the Radio Regulations.
- Use of EVSs in-motion (which means any time they are not “fixed”) must be coordinated using the recommendations developed and adopted by ITU-R (with participation of FS and FSS community). In the U.S. the National Spectrum Managers Association (NSMA) also developed a recommendation for frequency coordination procedures and a short-term interference objective of -145 dBW/4kHz) that should be part of the FCC regulations.

Coordination Avoids Interference

- The best way to protect against any potential for interference between ESV use of C-band and the FS is to follow the procedures that historically have allowed for co-primary uses of C-band: coordination!
- Once ESVs are coordinated, there is no need to treat them any different from any other coordinated FSS application:
 - Subject to blanket licensing (VSAT model);
 - Full term licenses;
 - Protected in transmit mode in C-band and transmit/receive in Ku-band;
 - Without limitation on amount of spectrum or space station of choice.
- Of all the comments filed in the FCC NPRM proceeding, there is not ***ONE SINGLE*** reported case of interference from a C-band ESV terminal on a commercial vessel to an FS station.

FCC Should Adopt WRC-03 Results

- USG worked diligently at WRC-00 and WRC-03 to establish worldwide recognition of ESVs as an FSS application.
- The Commission should now adopt these rules and regulations as agreed by the international community under U.S. leadership.