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LEVENTHAL SENTER & LERMAN PLLC

October 21, 2004

RAUL R. RODRIGUEZ
(202) 416-6760

E-MAIL
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

OCT 21 2004

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Dear Ms. Dortch:

This letter provides notice that, on October 20, 2004, Dr. Robert Hanson, Vice President/Regulatory Affairs of Maritime Telecommunications Network, Inc. ("MTN"), and the undersigned met with International Bureau staff members listed below 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, particularly those concerning the coordination of ESVs. The attached document was distributed at the meeting.

In response to a staff inquiry, Dr. Hanson explained that MTN tracks in real time all vessels on which it operates ESVs. MTN receives location reports in 15 minute intervals, which given the slow velocity of vessels, provides sufficient tracking information. In the highly unlikely event that a vessel were ever to steer outside the contours of its coordinated operating area, MTN can immediately detect this and shut off transmissions if necessary.

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.

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RRR/rjc
Attachment
cc (by e-mail): Howard Griboff
Paul Locke
Lisa Cocciatore

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ESV Frequency Coordination

Procedures for Frequency and Interference Analysis

Presentation to the
International Bureau

20 October 2004

Maritime Telecommunications Network, Inc.

ESV Coordination – part 1

clearly identify and define the operating contour, that is, the deep-draft channel inside the port leading to the berth, and the limits of the deep-draft sea lanes leading into and out of the port out to the coordination distance;

construct the composite coordination area around the operating area (i.e. the area enclosed by the operating contour) using the procedures given in ITU-R Rec. SF 1585 and identify potentially affected microwave receivers within the composite coordination area;

ESV Coordination – part 2

identify the operating parameters of the ESV including the satellite(s) to be used, the azimuth and elevation of the antenna (or range of these values), the EIRP_{max} of the emissions, the bandwidth of the emissions, and the frequency ranges to be investigated (n.b. ITU-R Rec. S.1587 gives typical characteristics for ESV systems if the actual parameters are not known) analyze the potential for interference to the potentially-affected microwave receivers using the procedures given in ITU-R Rec. SF.1649 either by the Critical Contour Point (CCP) method (see Annex 1 & 2 of ITU-R Rec. SF 1649) or the Path Integration method (see Annex 3 of ITU-R Rec. SF.1649), using the appropriate interference objective(s) and select the interference-free frequency ranges.

ESV Coordination – part 3

notify operators of microwave receivers within the composite coordination area for which there could be a potential for interference through the Prior Coordination Notification (PCN) developed by the NSMA for ESVs, which includes all of the FCC- and industry-standard administrative information and technical coordination data normally included in prior coordination notifications for fixed earth stations as well as:

- identification of the operating contour, including a copy of the applicable NOAA chart(s) of the port, and definition of the key points defining that contour, out to the maximum coordination distance from shore;
- explanation of the method used to identify the critical contour points or integration path for specific microwave receivers and the positions of the relevant analysis point(s) on the above-mentioned chart.

ESV Coordination – part 4

resolve all potential interference cases with the operators of the relevant FS stations as to whether the frequency can or cannot be used; establish based on the above analysis, which frequency ranges can be used within the operating contour without exceeding the applicable interference objectives.