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November 11, 2004

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **FOLLOW-UP TO *EX PARTE* MEETING**
IB Docket No. 02-10
Use of Satellite Earth Stations on Board Vessels

Dear Ms. Dortch:

On behalf of Broadband Maritime, Inc. ("Broadband Maritime"), this letter provides a follow-up response to a question posed by the Chief, Wireless Telecommunications Bureau (the "Bureau") at an *ex parte* meeting held on October 26, 2004 regarding the above-referenced docket. The meeting was reported by letter filed in this docket on October 27, 2004.

At the meeting, Broadband Maritime explained that its earth station on vessel ("ESV") C-Band operations would not cause harmful interference to fixed wireless C-Band operations, because Broadband Maritime's ESV operations use less bandwidth at lower power and a higher angle of elevation than fixed wireless operations. The Bureau Chief asked Broadband Maritime to propose operating parameters for ESVs that would protect fixed wireless operations from harmful interference from ESVs operating on a non-coordinated, non-interference basis.

In response, Broadband Maritime proposes the following requirements for C-Band operations on a non-coordinated, non-interference basis:

- ESV use only, and no fixed operations other than transient fixed ESV operations while the ship is docked at port.

- 2.4 meter antennas that meet both the parameters required by Annex 2 to International Telecommunications Union ("ITU") Resolution 902 adopted at WRC-03 and the Intelsat requirement (Gain for Theta > 2° is 32-25*LOG(Theta)).

- Minimum 20° angle of elevation for the main lobe.

- Horizontal EIRP < 41 dBm.
- Bandwidth < 300 kHz.
- No transmissions without satellite lock.
- Tracking and ability to shut off remotely from the control center.

The above requirements will protect fixed wireless operations from harmful interference. In its October 27, 2004 *ex parte* letter, Broadband Maritime presented an analysis demonstrating that ESVs will not cause harmful interference to fixed wireless operations. As demonstrated in the attachment to the October 27 letter, the smaller bandwidth and lower power of ESVs combined with the angle of elevation as specified above result in extremely low transmission power directed at the receiving antennas for the fixed operations—power that is below the threshold to cause interference. Adding the requirement that ESVs cannot transmit without satellite lock ensures the minimum angle of elevation. Lastly, the tracking requirement for ESVs combined with the remote shut-off capability will stop interference from continuing in the highly unlikely event that there ever is a case of interference.

Please address any inquiries regarding this matter to the undersigned.

Very truly yours,

/S/

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