

June 23, 2006

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Federal Communications Commission
Bureau of Operations

BY COURIER

Mr. James Burtle
Chief, Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, N.W.
Washington, DC 20554

Re: Deere & Company, File No. 0437-EX-ST-2006

Dear Mr. Burtle:

Deere & Company ("Deere"), by its attorneys, submits the enclosed document in reply to the comments of Mobile Satellite Ventures Subsidiary LLC ("MSV") in this proceeding, in which Deere seeks experimental authority to test receive only L-Band mobile earth stations using the Inmarsat-III-F4 geostationary satellite positioned at 142° west longitude.

MSV submitted as its comments a pleading that it filed in response to Deere's application for comparable testing authority in File No. SES-STA-20060605-00922. On June 21, 2006, Deere responded to MSV's comments in that proceeding, and demonstrated that the conditions MSV seeks to impose upon Deere's short-term testing authority are not warranted. Therefore, Deere attaches for inclusion in the record of this proceeding its June 21, 2006 response to MSV's comments.

Please contact the undersigned if you have any questions regarding the attached.

Sincerely yours,



Eliot J. Greenwald
Timothy L. Bransford

Enclosure

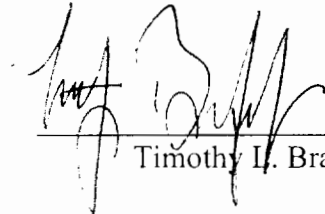
CERTIFICATE OF SERVICE

I, Timothy L. Bransford, hereby certify that on this 23rd day of June, 2006, I caused to be served a true copy of the foregoing "Reply" by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

James Ball* International Bureau Federal Communications Commission 445 12 th Street, S.W. Washington, DC 20554	Stephen Duall* International Bureau Federal Communications Commission 445 12 th Street, S.W. Washington, DC 20554
JoAnn Ekblad* International Bureau Federal Communications Commission 445 12 th Street, S.W. Washington, DC 20554	Richard Engelman* International Bureau Federal Communications Commission 445 12 th Street, S.W. Washington, DC 20554
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John Martin* International Bureau Federal Communications Commission 445 12 th Street, S.W. Washington, DC 20554	Robert Nelson* International Bureau Federal Communications Commission 445 12 th Street, S.W. Washington, DC 20554

<p>Roderick Porter* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>	<p>Cassandra Thomas* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>
<p>Bruce D. Jacobs David S. Koneczal Pillsbury Winthrop Shaw Pittman LLP 2300 N Street, N.W. Washington, DC 20037-1128 <i>Counsel for MSF</i></p>	<p>Jennifer A. Manner Vice President, Regulatory Affairs Mobile Satellite Ventures Subsidiary LLC 1002 Park Ridge Boulevard Reston, Virginia 20191</p>
<p>Diane J. Cornell Vice President, Government Affairs INMARSAT, INC. 1100 Wilson Blvd, Suite 1425 Arlington, VA 22209 Telephone: (703) 647 4767</p>	<p>John P. Janka Jeffrey A. Marks LATHAM & WATKINS LLP 555 Eleventh Street, N.W. Suite 1000 Washington, D.C. 20004 Telephone: (202) 637-2200</p>

**Via Electronic Mail*



Timothy L. Bransford

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
)	File No. SES-STA-20060605-00092
)	
Deere & Company)	
Application for Special Temporary Authority to)	
Operate Receive-Only Mobile Earth Stations with)	
Inmarsat III F4 at 142°)	
)	

REPLY COMMENTS OF APPLICANT

Deere & Company (“Deere”), by its attorneys, hereby files these Reply Comments in response to Comments filed by Mobile Satellite Ventures Subsidiary LLC (“MSV”) in the above captioned matter on June 6, 2006.¹ As set forth in greater detail below, Deere respectfully submits that MSV’s Comments pertain solely to the commercial use of the Inmarsat III F4, and fail to raise any material issues that require additional International Bureau (“Bureau”) review prior to the grant of Special Temporary Authority (“STA”) for technical testing purposes requested by Deere.² Accordingly, Deere reiterates its request that the Bureau grant the aforementioned STA using its streamlined review process.

¹ See Comments of Mobile Satellite Ventures Subsidiary LLC, at 1, FCC File No. SES-STA-20060605-00922 (June 6, 2006) (“*MSV Comments*”).

² See Deere & Company, Application, File No. SES-STA-20060605-00922 (June 3, 2006) (“*Deere Application*”).

Introduction

Since 2001, Deere has equipped domestic agricultural equipment with its GreenStar™ precision farming system (“GreenStar™ system” or “GreenStar™”).³ This system uses transmissions from Global Positioning Satellites (“GPS”) and the Inmarsat geostationary satellite at 98° west longitude to help farmers pinpoint their locations. It helps to both improve domestic crop yields and reduce harmful soil pollution resulting from overfertilization. On June 3, 2006, Deere submitted an STA application to conduct receive-only testing using a downlink carrier from the Inmarsat IIF4 in order to test routine upgrades to hardware and software associated with the GreenStar™ system, but unrelated to the RF equipment. On June 6, 2006, MSV filed comments in response to the STA application “urg[ing] the [International] Bureau to make clear that (i) grant [of the STA] should not be construed as a Commission endorsement of Inmarsat’s failure to coordinate the Inmarsat IIF4 satellite at its new location with other L-band operators; and (ii) Inmarsat must coordinate the Inmarsat IIF4 with other L-band operators before Deere can provide commercial service in the United States with this satellite.”⁴

Discussion

The Bureau should reject the conditions that MSV seeks to impose upon Deere’s STA. The conditions proposed by MSV represent an improper and transparent attempt to involve Deere in an ongoing dispute between MSV and Inmarsat involving frequency coordination between their respective satellites. Furthermore, neither of the proposed conditions address issues related to the STA, or the STA’s underlying merits. Rejecting

³ See Deere & Company, FCC File No. SES-LIC-20010112-00051 (“*Deere License*”).

⁴ See *MSV Comments* at 1.

these conditions avoids entangling Deere in a longstanding dispute properly resolved in another forum.

The first condition sought by Inmarsat is a Bureau instruction that “make[s] clear that [an STA] grant should not be construed as Commission endorsement of Inmarsat’s failure to coordinate the Inmarsat IIF4 at its new location with other L-band operators.”⁵ This condition is totally unrelated to the merits of Deere’s STA application. Deere requested a short-term STA to conduct experimental testing on a non-interference only basis, not an endorsement of Inmarsat’s frequency coordination efforts. The Commission should reject this proposed condition both as a transparent attempt to involve Deere in the above referenced conflict, and as improper relief unrelated to the underlying application.

MSV also asks the Bureau to “explain that use of the Inmarsat IIF4 satellite for commercial service in the United States will not be permitted unless and until Inmarsat coordinates this satellite at its new location with other L-band operators.”⁶ Deere, however, has not requested use of the Inmarsat IIF4 for commercial service. Instead, Deere seeks the short-term use of a receive-only transmission from Inmarsat IIF4 to test improvements with no more than twenty (20) GreenStar™ systems nationwide.⁷ Thus, this proposed condition is also unrelated to the merits of Deere’s STA application and improper.

⁵ See *MSV Comments* at 4.

⁶ See *MSV Comments* at 4.

⁷ See Deere Corrected Supplemental Letter, File No. SES-STA-20060605-00922 (June 6, 2006) (“*Deere Supplemental Letter*”)

Conclusion

For the reasons stated above and in the pending STA application, Deere respectfully requests that the Bureau reject the conditions proposed by MSV, and expeditiously grant Deere's requested STA authority.

Respectfully submitted,



Eliot J. Greenwald
Timothy L. Bransford
BINGHAM McCUTCHEN LLP
3000 K Street, Suite 300
Washington, DC 2007
202.373-6009
202.424.7645 fax
eliot.greenwald@bingham.com
timothy.bransford@bingham.com

Attorneys for Deere & Company

Dated: June 21, 2006

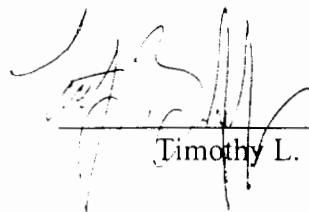
CERTIFICATE OF SERVICE

I, Timothy L. Bransford, hereby certify that on this 21st day of June, 2006, I caused to be served a true copy of the foregoing "Reply" by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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**Via Electronic Mail*



Timothy L. Bransford