

November 28, 2005

Via Hand Delivery

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

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Federal Communications Commission
Office of Secretary

**Re: Aeronautical Radio Inc.
File No. 0327-EX-PL-2005**

Dear Ms. Dortch:

Pursuant to Section 5.95 of the Commission's rules, Mobile Satellites Ventures Subsidiary LLC ("MSV") hereby opposes the above-referenced application filed by Aeronautical Radio Inc. ("ARINC"). MSV urges the Office of Engineering and Technology ("OET") to condition any grant of the application on (i) use of only Inmarsat-3 satellites; and (ii) use of only those frequencies that were coordinated for Inmarsat Ventures Ltd. ("Inmarsat") under the spectrum sharing arrangement negotiated in 1999 among the North American L band operators, exclusive of frequencies that were temporarily loaned but subsequently recalled by the lenders. MSV operates the U.S.-licensed L band satellite. MSV is concerned that use of uncoordinated Inmarsat satellites may result in harmful interference and jeopardize the coordination process. Moreover, Inmarsat's continued use of loaned frequencies precludes MSV from testing its new hybrid satellite and terrestrial system.

On November 8, 2005, ARINC filed the above-referenced application to test terminals with satellites operated by Inmarsat.¹ In its application, ARINC does not limit its proposed testing to terminals operating only with Inmarsat-3 satellites.

As discussed in the attached Petition,² Inmarsat-4 satellites have not been coordinated among the North American L band operators and, as a result, present a significant risk of interference. See *MSV Petition* (Exhibit A) at 3-4, 7-14. In the past, the International Bureau has refused to grant an application to operate with an uncoordinated satellite when it presents a risk

¹ See Application of Aeronautical Radio Inc., File No. 0327-EX-PL-2005 (November 8, 2005).

² See Mobile Satellite Ventures Subsidiary LLC, Public Copy of Petition to Hold in Abeyance or to Grant with Conditions Application of Telenor Satellite, Inc. to Operate BGAN Terminals with Inmarsat-4 Satellite, File Nos. SES-LFS-20050930-01352, SES-AMD-20051111-01564, ITC-214-20051005-00395 (November 23, 2005) ("*MSV Petition*").

Ms. Marlene H. Dortch

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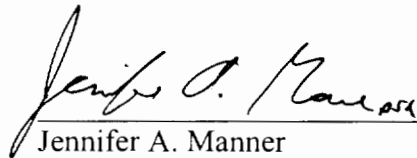
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of interference.³ Moreover, Inmarsat continues to use frequencies on its current system that were coordinated for MSV's own use under the 1999 spectrum sharing arrangement, then loaned to Inmarsat on a temporary basis, and that Inmarsat now refuses to relinquish or to refrain from using on its Inmarsat-4 satellites. *MSV Petition* (Exhibit A) at 4-5, 14-17. MSV needs access to this spectrum to conduct tests of its hybrid system and to implement its aggressive plan to deploy an interim-generation integrated satellite-terrestrial system. Interference from Inmarsat's operation on this loaned spectrum would occur immediately but for MSV's continued restraint in not using these frequencies so as to protect Inmarsat's customers.

Based on the foregoing, MSV urges OET to condition grant of the ARINC application on use of only Inmarsat-3 satellites and only those frequencies that were coordinated for Inmarsat under the spectrum sharing arrangement negotiated in 1999 among the North American L band operators, exclusive of frequencies that were temporarily loaned but subsequently recalled by the lenders.

Please contact the undersigned with any questions.

Very truly yours,



Jennifer A. Manner

Vice President, Regulatory Affairs

MOBILE SATELLITE VENTURES

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³ See Letter from Thomas S. Tycz, FCC, to Joseph A. Godles, Counsel for PanAmSat, File No. SAT-STA-19980902-00057 (September 15, 1998) (refusing to permit PanAmSat to operate C band payload until after coordinating with affected Administrations).