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Re: Request for Waiver of Part 87 Rules to allow Type Acceptance of Thales Avionics Ltd Aeronautical Satellite Communications System utilizing Inmarsat's SwiftBroadBand service. FCC Reference ID Nos. KV6TFS-SDU82155A1, KV6TFS-SDU82155D, KV6TFS-HPA82166A.

Inmarsat Inc. is writing in support of a request for waiver filed by Thales Avionics Ltd ("Thales") of sections 87.131, 87.173(a), and 87.141(j) of the Federal Communication Commission's rules to permit certification of its Top Flight Satellite Data Unit (SDU) transceiver, to support Inmarsat SwiftBroadband (SwiftBB) 16QAM (Quadrature Amplitude Modulation) channels. The FCC reference IDs are KV6TFS-SDU82155A1, KV6TFS-SDU82155D, KV6TFS-HPA82166A. Thales wishes to market and sell this transceiver to support a new aeronautical data and voice communications service offered by Inmarsat under the trade name SwiftBroadBand (SwiftBB). Inmarsat submits that the grant of this waiver would be in the public interest and urges the Commission to grant Thales' request.

Permitting the use of SwiftBroadBand services in the Aviation Service will not cause harmful interference to safety-of-life satellite users, Radio Astronomy or other aeronautical mobile satellite users as the technical requirements related to spurious emissions in relevant frequency bands, and Priority and Pre-emption as currently stated in Part 87 are met. This waiver request is only to allow for the use of 16QAM, as the authorised emissions do not include QAM. Thales seeks a waiver specifically for 50K0D1W, 100KD1W and 200KD1W for the two new types of SDU.

Inmarsat has designed the SwiftBB service specifically for aeronautical use. SwiftBroadBand is designed to work co-operatively with the Aero H/H+ safety service without impairing the priority and pre-emption mechanisms.

In summary, we believe that the introduction of the Inmarsat SwiftBB service is a significant step forward in the provision of aircraft communications service, both in performance and cost, and that the technical issues involved as outlined in the Thales request have been adequately dealt with. Granting the waivers and ultimately certification will allow aircraft passengers to connect to obtain data services at higher rates, approaching 500 kbps. Accordingly, we fully support the Thales request for a waiver of Part 87 rules.

Respectfully Submitted,



Diane Cornell

Vice President, Government Affairs

Cc: Jeffrey Tobias