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February 27, 2008

VIA MESSENGER

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

ORIGINAL

Re: Mobile Satellite Ventures Subsidiary LLC SkyTerra Communications, Inc. Joint Petition for Declaratory Ruling <u>IBFS File No. ISP-PDR-20070314-00004</u>

FILED/ACCEPTED FEB 2 7 2008 Sederal Communications Commission Office of the Secretary

Dear Ms. Dortch:

SkyTerra Communications, Inc., by its attorneys hereby submits this letter ("Letter") pursuant to Section 1.65 of the rules of the Federal Communications Commission ("Commission") to update the above-referenced joint request for a declaratory ruling, as supplemented and amended ("Petition"), to provide updated information regarding the ownership of SkyTerra. Such updated ownership information is set forth below. This Letter also clarifies that, due to rounding, there may be slight variances between the numbers reported in the charts depicted in Attachments 2 and 3 to the Petition and the numbers reported in Attachments 7(a)-(b) and 8(a)-(b).

On February 4, 2008, Harbinger Capital Partners Fund I, L.P. ("Harbinger Partners") purchased non-voting stock in SkyTerra. Harbinger Partners is a private investment fund affiliated with the Harbinger Funds (as defined in the Petition); SkyTerra understands that Harbinger Partners is owned, organized, and controlled 100% domestically. Thus, as a result of Harbinger Partners' purchase of non-voting stock in SkyTerra, the total foreign equity in SkyTerra, and thus MSV, was reduced from the amounts previously reported to the Commission. Because Harbinger Partners purchased non-voting stock, the transaction had no effect on the foreign voting in SkyTerra or MSV.

In addition, between February 8 and 14, 2008, Harbinger Partners purchased voting stock in SkyTerra. SkyTerra cannot state with certainty whether the voting shares were purchased from U.S. or foreign shareholders because Harbinger Partners purchased these voting shares on the open market. SkyTerra understands that Harbinger Partners is 100% owned, organized, and AKIN GUMP STRAUSS HAUER & FELDLLP Attorneys at Law

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controlled domestically. Accordingly, for purposes of its foreign ownership analysis, SkyTerra assumed that Harbinger Partners purchased the shares from U.S. individuals or entities. Thus, Harbinger Partners' purchase of the voting stock had no effect on the foreign ownership of SkyTerra or MSV.

Please do not hesitate to contact the undersigned with any questions regarding this matter.

Sincerely, Im W. Janie

Tom W. Davidson, Esq. Karen Milne, Esq. Counsel for SkyTerra Communications, Inc.

Enclosure

cc: Susan O'Connell, Esq., FCC (via e-mail) Jodi Cooper, Esq., FCC (via e-mail) Howard Griboff, Esq., FCC (via e-mail) Francis Gutierrez, Esq., FCC (via e-mail)