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May 26, 2006

By Hand Delivery

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

RECEIVED

MAY 26 2006

**Federal Communications Commission
Office of Secretary**

Re: Thrane & Thrane Airtime Ltd.
Amendment to Application for Section 214 Authority, File No. ITC-214-
20060413-00241

Dear Ms. Dortch:

By this letter, Thrane & Thrane Airtime Ltd. ("T&T Airtime") hereby amends its application for Section 214 authority, File No. ITC-214-20060413-00241, filed April 13, 2006. In that application, T&T Airtime requested authority to offer global facilities-based and resold international telecommunications services. T&T Airtime wishes to amend its application to clarify that the authority it seeks would include the authority to offer (a) Inmarsat Broadband Global Area Network ("BGAN") using the Inmarsat fourth generation satellite located at 52.75° W.L. ("the Inmarsat 4F2"), and (b) existing Inmarsat services, including Inmarsat mini-M, M4, B and C services, also using the fourth generation Inmarsat satellites.

BGAN Service

This amendment seeks to broaden the requested authority in the underlying Section 214 application to include all fourth generation Inmarsat satellites, including the Inmarsat 4F2, so that T&T Airtime will be authorized under Section 214 of the Communications Act to offer the BGAN service using any of the fourth generation satellites. Inmarsat has already launched a fourth generation Atlantic Ocean Region ("AOR") satellite at 52.75° W.L. Another satellite is under construction, and may be launched at approximately 178° E.L. to provide Pacific Ocean Region ("POR") coverage. By covering all of the fourth generation Inmarsat satellites in this application for Section 214 authority, it will be more efficient for the Commission and for T&T Airtime.

As set forth in its related applications for earth station license and Title III special temporary authority,¹ the BGAN services will allow consumers to obtain enhanced Mobile Satellite Services ("MSS") at much higher data transmission speeds than current MSS product offerings. This will allow the use of high data rate applications that are either not supported or offer limited functionality with existing MSS offerings. The BGAN service will offer MSS customers the ability to access broadband service from everywhere in the U.S. and most of the world at data transmission speeds unmatched by today's MSS offerings. This will allow MSS consumers to use high data rate applications like video conferencing, video on demand, and networking applications that are not fully supported by existing MSS offerings. For these reasons, the grant of this application is in the public interest.

Existing Inmarsat Services

This amendment also seeks authority for T&T Airtime to offer existing Inmarsat services (including Inmarsat B, C, M, Mini-M and M4 over the fourth generation Inmarsat satellites. Since 2003, Thrane & Thrane, Inc. ("T&T Inc."), an affiliate of T&T Airtime, and T&T Inc.'s predecessor-in-interest, LandSea Systems, Inc., has been licensed to serve as an Inmarsat Point of Service Activation for the United States and provide airtime to all international points in accordance with Section 63.18(e)(3) of the rules. File No. ITC-214-20030424-00203. The existing Inmarsat services are currently provided by T&T Inc. using third generation Inmarsat satellites. Inmarsat will be migrating these existing Inmarsat services from the third generation satellites to fourth generation satellites. T&T Airtime requests authority to offer these existing Inmarsat services after they are migrated from the third generation Inmarsat satellites to the fourth generation Inmarsat satellites.

The following is a brief description of these existing Inmarsat services:

- ♦ **Mini-M:** Inmarsat Mini-M service offers low speed (2.4 kbps) voice, fax, and data capabilities. The Mini-M terminals are the smallest, lightest and most power efficient of all of the Inmarsat voice terminals. Transportable terminals are the size of a notebook computer and weigh approximately 11 pounds. Marine terminals have radomes measuring 6 inches tall and weigh approximately 11 pounds.
- ♦ **M:** Inmarsat M service offers voice (6.2 kbps) and data and fax (2.4 kbps). It can also be used for Internet access and e-mail. Transportable terminals are the size of a briefcase and weigh approximately 22 pounds. Marine terminals have radomes that are approximately 2.5 feet high and weigh approximately 66 pounds.
- ♦ **M4:** Inmarsat M4 service offers low speed (2.4 kbps) voice, fax and data capabilities combined with high speed (64 kbps) data service. It uses small, lightweight and power efficient user terminals that are the size of a laptop computer and weigh approximately 15 pounds.
- ♦ **B:** Inmarsat B service offers voice (16.0 kbps), fax (14.4 kbps) and data (9.6 kbps). In addition, it offers high speed data service at speeds up to 64 kbps. Transportable terminals are

¹ SES-LFS-20060522-00852 (Call Sign E060179); SES-STA-20060522-00857 (Call Sign E060179).

the size of a small suitcase and weigh between 33 and 44 pounds. Marine terminals have radomes that range from 3.3 to 4.0 feet high and weigh between 132 to 154 pounds.

♦ C: Inmarsat C service offers store-and-forward data messaging service. This service allows client anywhere in the world to send, fax, e-mail and telex messages as well as specialized ship-to-shore and shore-to-ship services.

These Inmarsat services are used by a wide range of T&T Inc. customers, including the U.S. military, federal government, and private sector end-users in the United States. Federal Government users include the US Army, Air Force, Marine Corps, DEA, FBI, U.S. Departments of State, Justice and Homeland Security (including FEMA), the Library of Congress, the Center for Disease Control, and NOAA.

Grant of this application as amended will allow T&T Airtime to provide existing Inmarsat services to the above customers using fourth-generation Inmarsat satellites. As set forth above, these Inmarsat services are used to facilitate military communications, law enforcement and homeland security, emergency relief efforts, protect lives and safeguard property, and to provide critical communications services. Any disruption of services to such customers would not be in the public interest.

T&T Airtime respectfully requests that the Commission accept this amendment and grant the underlying Section 214 application to allow T&T Airtime to offer BGAN and existing Inmarsat services over fourth-generation Inmarsat satellites.

Should you have any questions regarding this matter, please feel free to contact the undersigned directly.

Sincerely,



Eric Fishman
Counsel to
Thrane & Thrane Airtime Ltd.

cc: Attached certificate of service

CERTIFICATE OF SERVICE

I, Eric Fishman, an attorney with the law firm of Holland & Knight LLP, hereby certify that on this 26th day of May, 2006, a true copy of the foregoing Amendment to the Section 214 application of Thrane & Thrane Airtime Ltd. was served by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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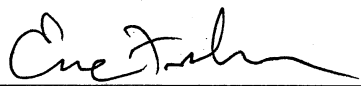
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Federal Communications Commission
Commission Registration System (CORES)
CORES Certification Form

I, Marianne C. Trana, certify that the FCC Registration Number (FRN) listed below is true and correct to the best of my knowledge, information and belief.

FCC Registration Number (FRN)

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