

**Telenor Satellite, Inc.**

**Request for Special Temporary Authority**

**International Section 214 Application to Provide  
Inmarsat BGAN and E&E Services**

Attachment 2

Applicant Telenor Satellite, Inc., a Delaware Corporation, is 100% owned by Telenor Satellite Services Holdings, Inc., a Delaware Corporation. Telenor Satellite Services Holdings, Inc. is in turn 100% owned by Telenor Satellite Mobile AS, a Norway Corporation. Telenor Satellite Mobile AS is in turn 100% owned by Telenor Satellite Mobile Ventures AS, a Norway Corporation. Telenor Satellite Mobile Ventures AS is in turn 100% owned by Telenor Satellite Services, AS, a Norway Corporation. Telenor Satellite Services, AS is in turn 100% owned by Telenor ASA, a Norway Corporation. Telenor ASA is 53.99% owned by the Kingdom of Norway, and 46.01% of its shares are listed on NASDAQ and the Oslo Stock Exchange and are owned by members of the public. In its December 2001 Order approving the assignment of various Title II authorizations and Title III licenses from COMSAT Corporation to Telenor Satellite, Inc., the FCC authorized the indirect ownership of Telenor Satellite, Inc. by Telenor ASA, concluding that ownership by the Kingdom of Norway of more than 25% of the shares of Telenor ASA would not cause harm to competition.<sup>1</sup>

Telenor ASA, Telenor Satellite Services AS, Telenor Satellite Mobile Ventures AS and Telenor Satellite Mobile AS all share the same contact information:

Snarøyveien 30  
1331 Fornebu  
Norway  
011-47-67-89-00-00

Contact information for Telenor Satellite Services Holdings, Inc. is as follows:

1101 Wootton Parkway  
Rockville, MD 20852  
301-838-7750

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<sup>1</sup> See *In the Matter of Lockheed Martin Global Telecommunications et al., Applications for Assignment of Section 214 Authorizations, Private Land Mobile Licenses, Experimental Licenses, and Earth Station Licenses*, 16 FCC Rcd 22897 (2001), at ¶¶ 35-36. The ownership chain described above is slightly different from the chain described in the FCC Order due to minor Telenor corporate restructuring, and the percentage of public ownership of Telenor ASA is higher than previously reported (46.01% vs. 37.35%). Such minor changes are permitted under the Commission's Order. See 16 FCC Rcd 22897 at ¶ 36.

On October 25, 2006, Telenor ASA and Apax Partners France announced an agreement to sell Telenor Satellite Services to Apax. The parties will soon file applications seeking approval of that transaction.

Telenor has previously received authority under Section 214 of the Communications Act. In December 2001, the Commission approved the assignment of various Title II authorizations from COMSAT Corporation to Telenor.<sup>2</sup> In addition, Telenor received International Global Facilities-Based and Resale Authority under Section 214 in October 2002.<sup>3</sup>

By this Application, Telenor requests Section 214 authority to operate as a facilities-based and resale common carrier provider of domestic and international services via the Inmarsat I-4 satellite located at the 52.75° W.L. orbital location. Telenor hereby certifies that it will comply with the terms and conditions in 47 C.F.R. §§ 63.21, 63.22 and 63.23.

The services offered by Telenor include the Inmarsat Broadband Global Area Network (“BGAN”) service originating and terminating in the United States and abroad. The BGAN services will allow consumers to obtain an enhanced Mobile Satellite Services (“MSS”) offering at much higher data transmission speeds than current MSS product offerings. This will allow the use of high-bandwidth applications that are either not supported or offer limited functionality with existing MSS offerings.

Inmarsat’s BGAN service is provided using newly-developed Inmarsat-4 (“I-4”) satellites that offer much greater traffic-bearing capability than the previous generation of Inmarsat satellites and therefore allow for the provision of broadband satellite service. The first I-4 satellite was launched on March 11, 2005 to the 64° E.L. orbital location over the Indian Ocean.<sup>4</sup> The second I-4 satellite (Inmarsat 4F2), which is used to provide service in the United States, was launched in November 2005 to the 52.75° W.L. orbital location. With these two satellites, the BGAN service covers approximately 85% of the earth’s surface.<sup>5</sup>

The BGAN service supports both Internet Protocol packet-switched data and circuit-switched applications. The service allows data transfer speeds between 384 Kbps to 492 Kbps in the downlink direction and 240 Kbps to 492 Kbps in the uplink direction, depending on the type of MET. These higher data transmission rates allow Telenor customers to have access to e-mail, local area networks, the Internet, intranet/extranets, videoconferencing services, video-on-demand, and voice communications from almost anywhere in the world.

In sum, the BGAN service offers MSS customers the ability to access broadband service from anywhere in the U.S. and most of the world at data speeds unmatched by today’s MSS

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<sup>2</sup> See 16 FCC Rcd 22897 at App. A.

<sup>3</sup> See File No. ITC-214-20020926-00462 (granted Oct. 25, 2002).

<sup>4</sup> Telenor has filed a separate application for blanket earth station authority to operate mobile earth terminals (“METs”) that will access the Inmarsat I-4 satellite at the 52.75° W.L. orbital location.

<sup>5</sup> A third Inmarsat-4 satellite is under construction.

offerings. This allows MSS consumers to use high-bandwidth applications like videoconferencing, video-on-demand, and networking applications that were not fully supported by previous MSS offerings. For these reasons, the extension of Telenor's current STAs is in the public interest.

The services currently offered on Inmarsat 4F2 also include Inmarsat-B, Inmarsat C, Inmarsat Mini-M and Aero Mini-M, GAN, Aero-H and H+, Aero-I, and Swift. As shown below, each of those services is used by Telenor's customers to meet critical telecommunications needs.

Inmarsat B is used by the U.S. Navy and U.S. Coast Guard, as well as commercial shipping companies, to support communications to and from ships at sea. Inmarsat B terminals are also deployed by the U.S. State Department at American embassies worldwide, and these terminals are also used by the Department of Homeland Security and the National Guard.

Inmarsat C supports GMDSS, the Global Marine Distress and Safety System. It also aids in tracking fishing fleets in U.S. territorial waters and commercial shipping approaching the U.S. coastline.

Mini-M, Aero Mini-M and GAN services are used by every branch of the U.S. military in support of training and deployment to Iraq, Afghanistan and around the world. These services are also used by the State Department, DHS and the National Guard, as well as by news organizations covering events in Iraq, Afghanistan and elsewhere.

Aero-I service is used by the Air Mobility Command, the Air Force component of the United States Transportation Command. Aero-H and H+ services, as well as Swift services, are used aboard U.S. Presidential aircraft, including Air Force One, both by government officials and by journalists covering the President. Aero-H and Swift services are also used by the 89<sup>th</sup> Air Wing to support the Administration, Congress and flag officers of the different services. In addition, these services are used to support the U.S. military's Commanders in Chief (CinCs), and other classified airborne assets.

Disruption of any of these services would be costly, and in many cases service interruption would have an adverse effect on vital national interests. Accordingly, the extension of Telenor's current STAs is in the public interest.

The facilities-based authority under Section 63.18(e)(3) requested in this Application is categorically excluded from environmental processing under Section 1.1306 of the Commission's Rules. Therefore, an environmental assessment pursuant to Section 1.1311 of the Commission's Rules is not necessary.