

EX PARTE OR LATE FILED

December 12, 2003

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

Int'l Bureau
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Front Office

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Mobile Satellite Ventures Subsidiary LLC
Ex Parte Presentation
IB Docket No. 01-185
File No. SAT-MOD-20031118-00333 (ATC application)
File No. SAT-AMD-20031118-00332 (ATC application)
File No. SES-MOD-20031118-_____ (ATC application)
File No. SAT-AMD-20031118-00335 (replacement satellite application)

Dear Ms. Dortch:

On December 11, 2003, Lon Levin, Vice President of Mobile Satellite Ventures Subsidiary LLC ("MSV"), Peter Karabinis, Vice President and Chief Technical Officer of MSV, and Bruce Jacobs and David Konczal of Shaw Pittman LLP, counsel for MSV, met with the following International Bureau staff members: William Bell, Breck Blalock, Lisa Cacciatore, Howard Griboff, William Howden, Paul Locke, John Martin, Kathryn Medley, Robert Nelson, Richard Tseng, and Tom Tycz. MSV presented the information contained in the attached set of presentation materials.

Please direct any questions regarding this matter to the undersigned.

Very truly yours,


David S. Konczal

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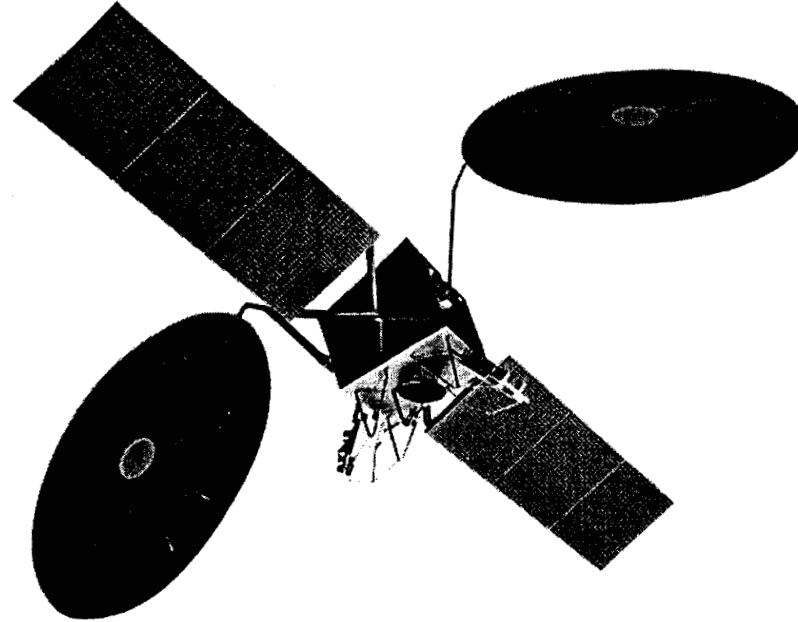
cc: William Bell
Breck Blalock
Lisa Cacciatore
Howard Griboff
William Howden
Paul Locke
John Martin
Kathryn Medley
Robert Nelson
Richard Tseng
Tom Tycz

MSV's MSS with ATC

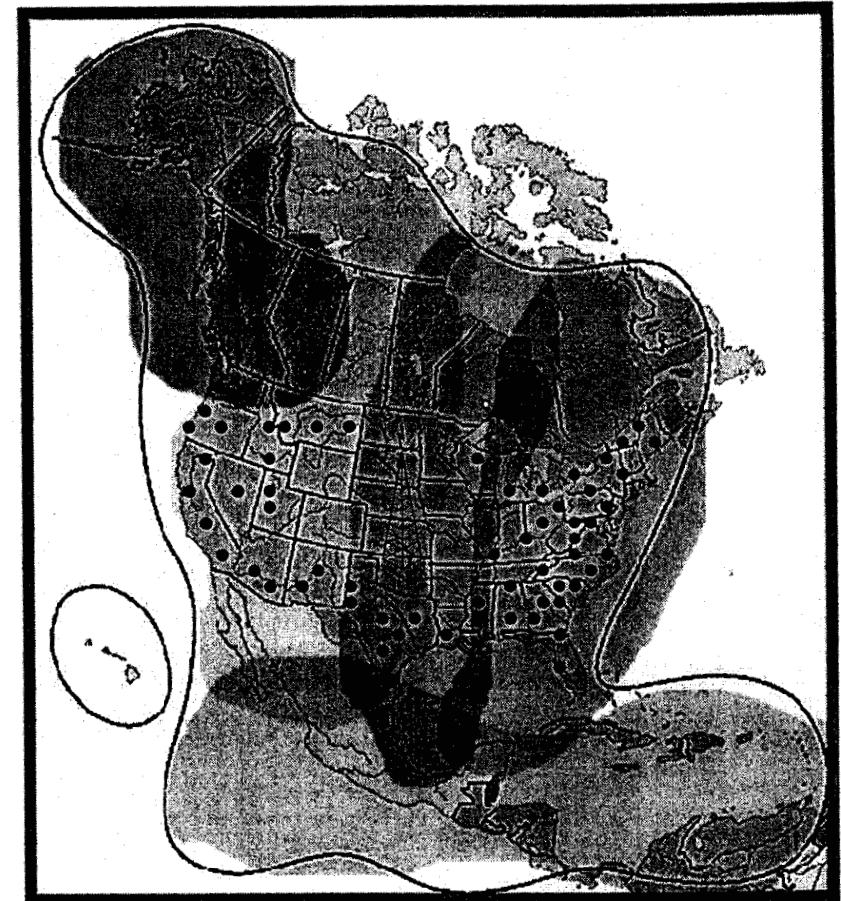
Presented to the FCC on December 11, 2003



MSV's First Generation MSS with ATC

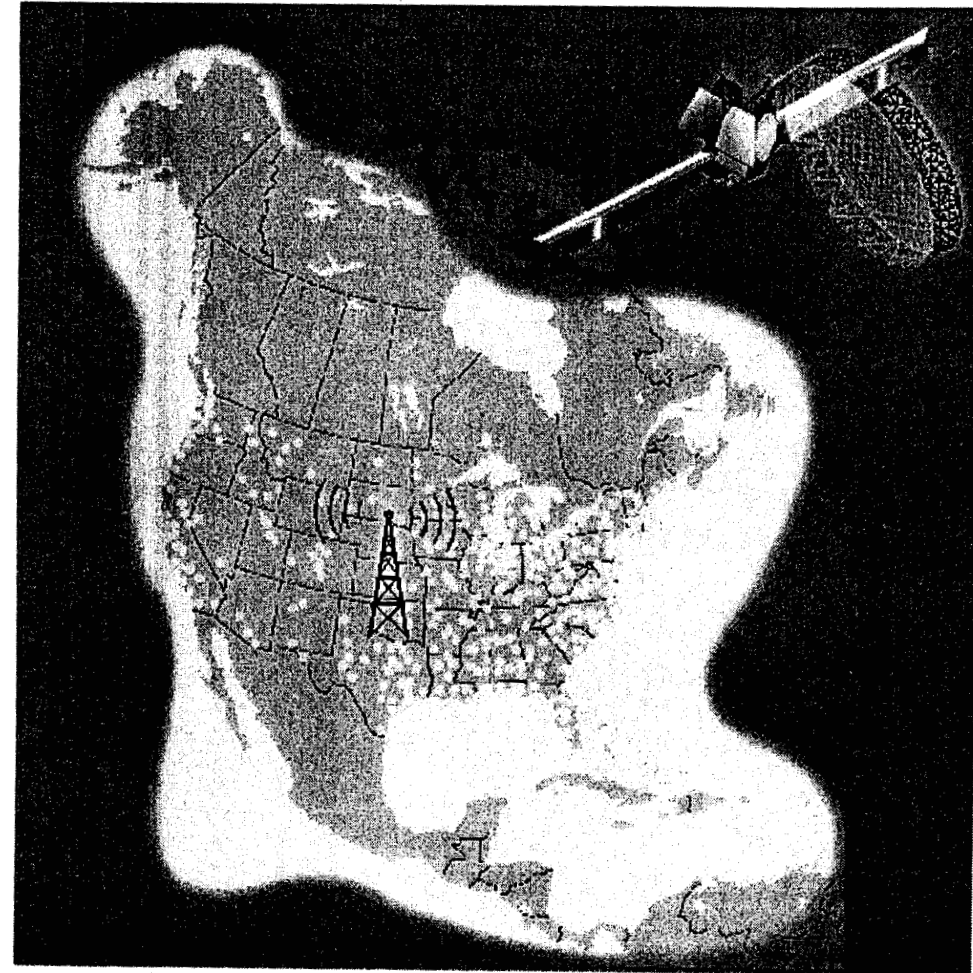


- **First generation satellite system with ATC**
- **Efficient spectrum reuse**
- **Mass-market standards (e. g., CDMA, GSM)**
- **Fully integrated end-user device with companion antenna booster**

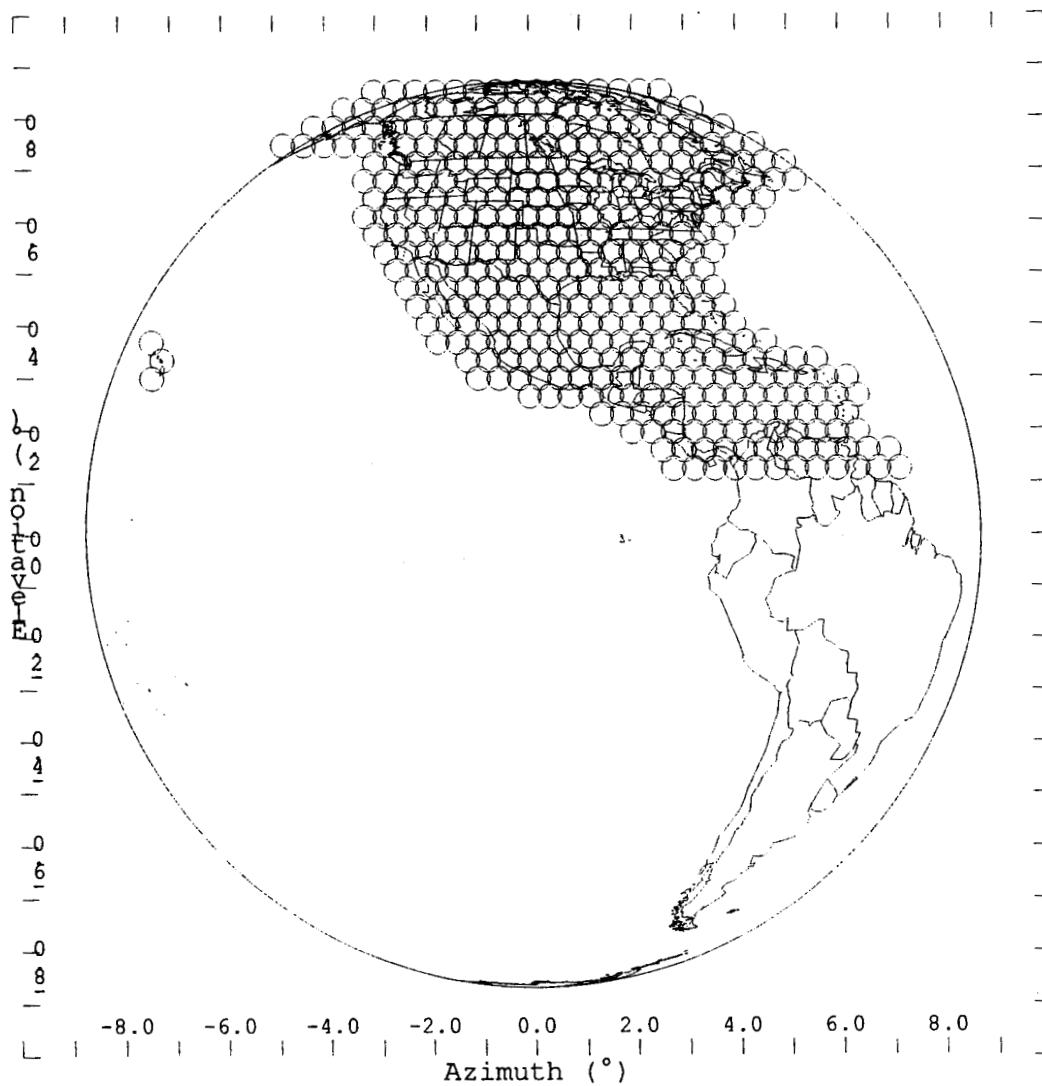


MSV's Next Generation MSS with ATC

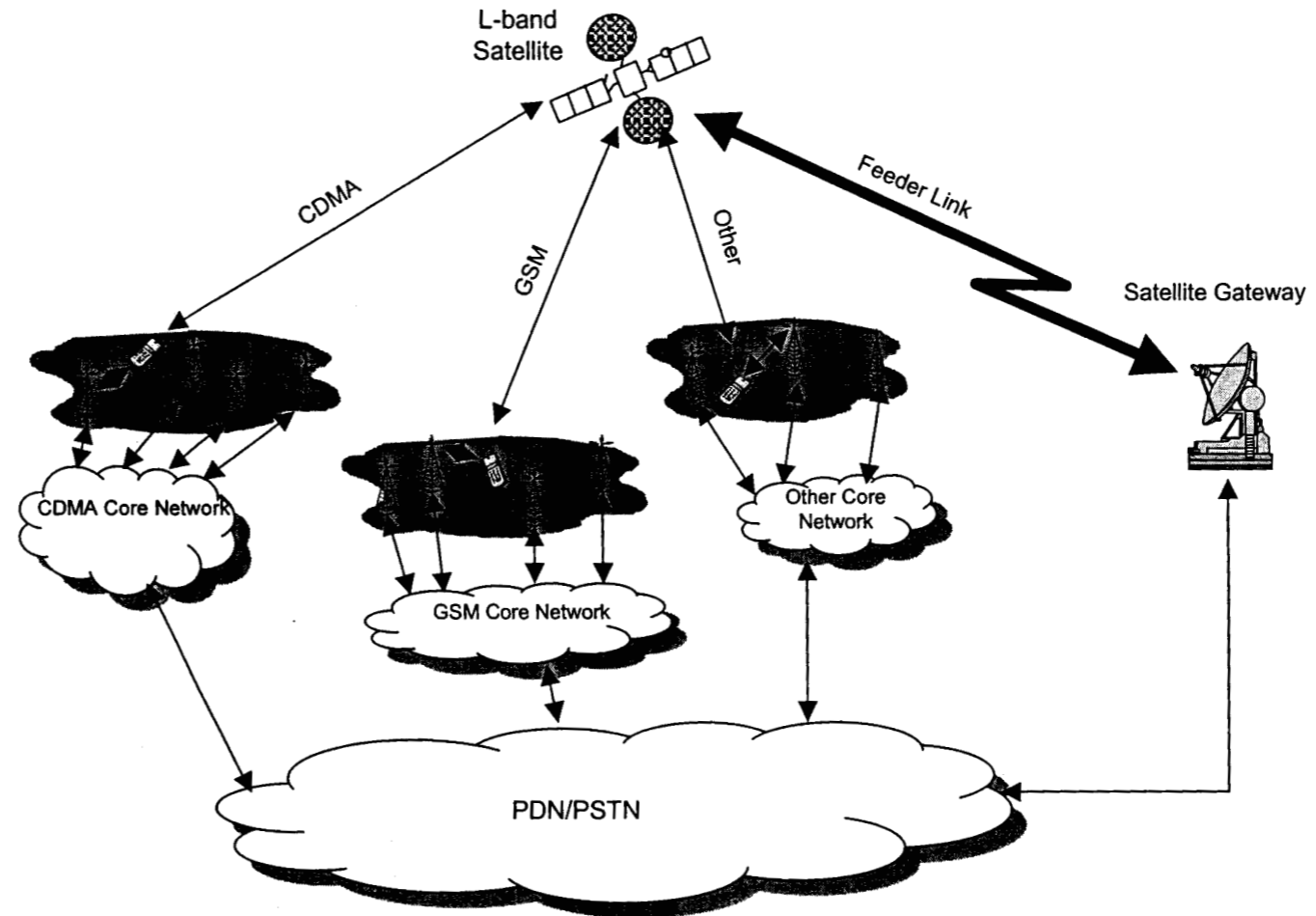
- Next generation satellite system with ATC
- Higher spectrum reuse efficiency
 - Many more satellite spot beams
- Mass-market standards (e. g., CDMA, GSM)
- End-user device remains fully integrated and no longer needs a companion antenna booster



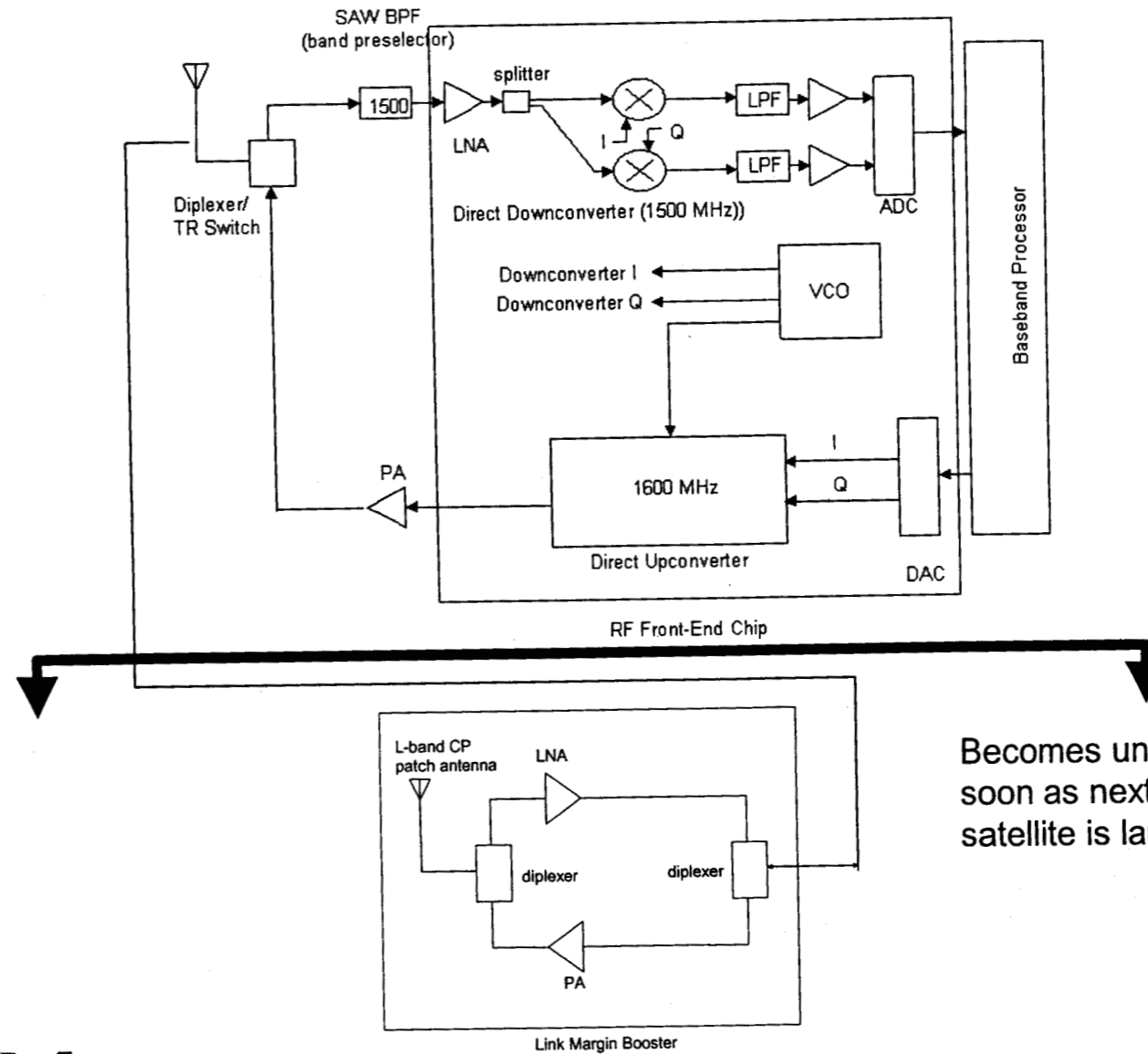
Satellite System Footprint Covered by Next Generation Spot Beams



MSS Network Architecture with ATC

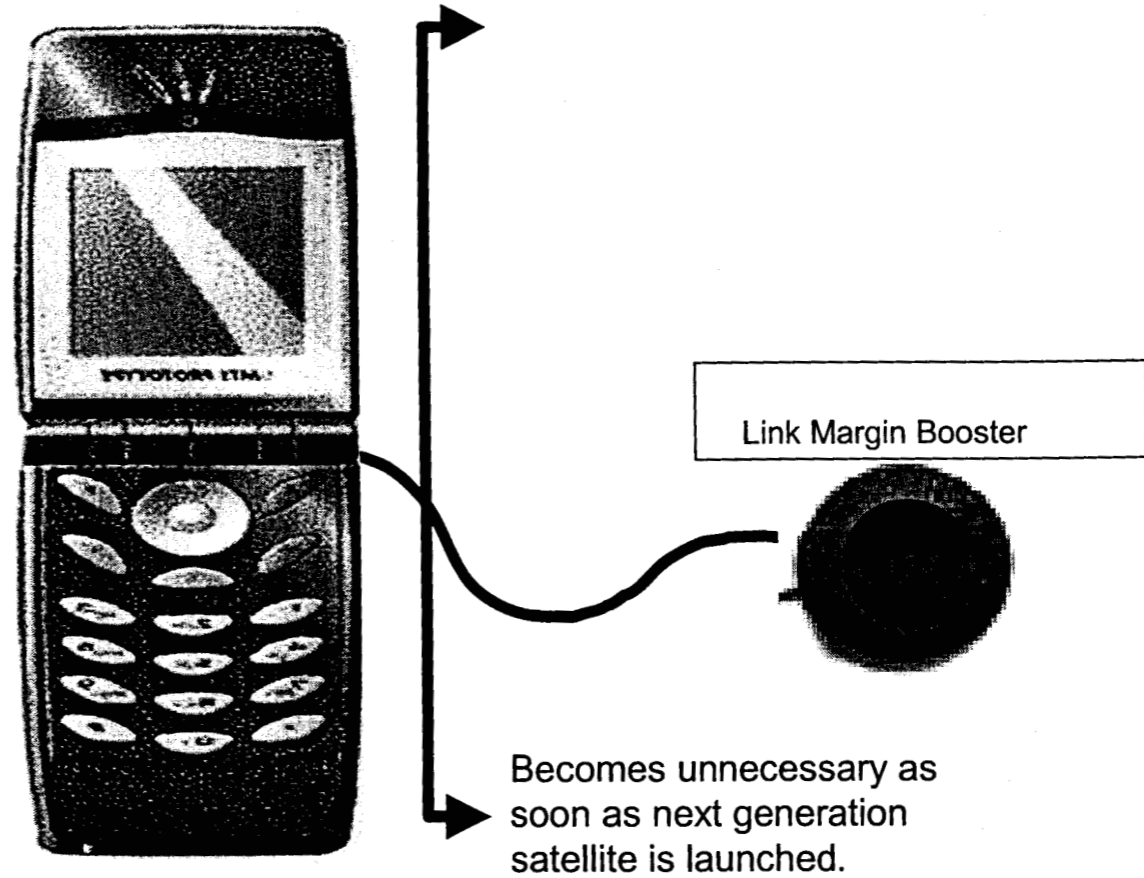


Block Diagram of Integrated End-User Terminal



Becomes unnecessary as soon as next generation satellite is launched.

Artist's Depiction of Integrated End-User Terminal with Antenna Booster Companion



Key Issues

- $\Delta T/T$
 - Up to 6% should be allowed for the ATC
 - Irrefutably defensible (less than 0.2 dB of link margin loss)
 - The satellite $\Delta T/T$ impact is dropping like a rock
- **Cochannel vs. non-cochannel**
 - Non-cochannel frequencies should be exempt from reuse restrictions
 - Non-cochannel frequencies cannot be interfered with
- **Overload Threshold of Inmarsat METs**
 - All measurements indicate that more than -45 dBm of power is needed to cause overload

Deviations from Commission's Baseline used by MSV to Develop ATC

- 80% deployment of total ATC in the United States
 - Same $\Delta T/T$ impact to Inmarsat
- MT average antenna gain ≤ -4 dBi
 - MSV will provide MT prototype data to prove
- Half-rate vocoder
 - Provides 3.5 dB interference reduction consistent with Commission's assumptions
- GSM and CDMA air interface protocols
 - Aggregate interference constrained not to exceed authorized limit

Waiver Requests

- Increase of cochannel reuse up to 6% $\Delta T/T$
 - Unlimited reuse of non-cochannel frequencies
- Increase of base station EIRP per sector by 15 dB
 - Eliminate limit on number of carriers per sector
- Increase base station PFD limit by 15 dB at airport runways/stand areas and at waterways
- Reduce base station overhead gain suppression
 - Less than 0.03 dB impact to airborne METs
- Eliminate limit on aggregate adjacent channel traffic