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Chairman Michael K. Powell
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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-20031118-01879 (ATC application)

Dear Chairman Powell:

Level 3 Communications ("Level 3") is a long-time supporter of Commission initiatives to make more spectrum available for wireless broadband services. We believe that realignment of spectrum and new spectrum rules encouraging new wireless and mobile broadband products is essential to maintain the strength of the nation's economic competitiveness. As you may be aware, over the past year Level 3 has publicly taken this position both on behalf of our customers and on behalf of the tens of millions of consumers they serve. Wireless broadband services represent one of the most promising emerging opportunities in communications today. The roll out of these services will bring broadband to millions of new consumers, as well as encouraging new consumer products and new enterprise services – all in a brand new segment that is in addition to existing broadband offerings.

Level 3 is particularly interested in the potential for L-band Mobile Satellite Service ("MSS") spectrum to be put to use in the very near future for truly ubiquitous wireless broadband services. Vendors of wireless technology whose platforms will make possible the delivery of broadband wireless access to consumers and businesses via notebook PCs, handheld devices, and other forms are seeking differentiated spectrum platforms for deployment by new operators. Level 3 believes that spectrum viable for broadband access is critical to growth of its business and that MSV's ATC capability offers the unique prospect of facilitating both new broadband wireless technology and ubiquitous coverage.

Commission grant of sufficient capacity to L-band MSS systems for the Ancillary Terrestrial Component of their systems is critical to Level 3's planning, our retail communications provider

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customers and wireless technology vendors. To justify the expense of adding L-band capability to tens of millions of devices, these vendors need to be reasonably confident that the Commission's rules will permit operators providing service in the L-band to have sufficient capacity to provide millions of users with broadband service that includes an "anytime, anywhere" service component. Similarly, Level 3 and prospective new operators need such confidence to drive deployment planning.

As a facilities based carrier Level 3 has traditionally not focused on the MSS sector due to excessively large user terminals, lack of urban and suburban service coverage, low data rates, and excessive equipment and service prices characterizing MSS offerings. Because MSS user terminals do not operate reliably in urban environments due to satellite signal blockage, MSS operators have been unable to offer a truly ubiquitous service. Hybrid satellite/terrestrial networks, however, will fundamentally change the nature of MSS by substantially increasing coverage and capacity. For the first time, customers in the most remote areas to the most densely populated urban cores will be able to enjoy broadband wireless services.

Level 3 looks forward to your decision in this proceeding and hope that you will act to unleash the enormous potential for L-band MSS spectrum to be used for a truly ubiquitous wireless broadband service.

Very truly yours,



Brian Gardepe