Federal Communications Commission
Washington, D.C. 20554

April 23, 2004

Mr. Lon C. Levin
Vice President
Mobile Satellite Ventures Subsidiary LLC
10802 Parkridge Boulevard
Reston, VA 20191

Re: Application of Mobile Satellite Ventures Subsidiary LLC for
       Authority to Launch, and Operate Replacement Mobile Satellite
       Service Space Station @ 101 W.L., Call Sign S2358 File No.
       SAT-AMD-20031118-00335.

Dear Mr. Levin:

       On November 18, 2004, Mobile Satellite Ventures Subsidiary LLC ("MSV") filed
an amendment to its pending applications for its next generation Mobile-Satellite Service
(MSS) system. For the reasons discussed below, we find that additional information is
needed before we can complete our review of the amendment.

       The Commission requires all applications for space station licenses to be
substantially complete when they are filed. Applications that are not substantially
complete are returned to the applicant without further processing.[1] The Commission's
Part 25 Rules set forth various information requirements that applicants must provide in
their space station applications.[2] In particular, for applicants requesting launch and
operating authority for space stations in the Fixed-Satellite Service (FSS), Section 25.140
of the Commission's rules requires, among other things, an interference analysis.[3] The
interference analysis must demonstrate that the proposed FSS satellite system will be
compatible with the Commission's two-degree orbital spacing environment. On
December 3, 2003, the International Bureau released a Public Notice concerning this
analysis.[4] The public notice clarified the types of showings that must be provided and

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[1] *See e.g.,* Amendment of the Commission's Space Station Licensing Rules and Policies, *First Report and Order and Further Notice of Proposed Rulemaking,* IB Docket No. 02-34, 18 FCC Rcd 10760, 10852 (para. 244) (2003), *citing* Amendment of the Commission's Space Station Licensing Rules and Policies, *Notice of Proposed Rulemaking,* IB Docket No. 02-34, 17 FCC Rcd 3847, 3875 (para. 84) (2002).

[2] *See* 47 C.F.R. Part 25.

[3] 47 C.F.R. § 25.140(b)(2).

[4] See Clarification of 47 C.F.R. § 25.140(b)(2), Space Station Application Interference Analysis, Public Notice No. SPB-195, DA 03-3863, December 3, 2003.

stated that applications filed prior to the December 3, 2003 not meeting the requirements may be subject to a request for further information.

The interference analysis applicable to your November 2003 amendment is subject to the method delineated under option 3 of the public notice. Pursuant to Option 3, the interference analysis must provide an analysis showing the potential of interference into and from carriers of adjacent satellites with a spacing of 2 degrees.[5] This analysis must include the r.f. characteristics of both interfering and interfered with carriers, as well as the resulting interference potential, such that the Commission or other applicants in the future course of consideration of these applications can complete the analysis.[6] This information was not provided in the application.

To proceed in processing the application, an interference analysis containing this information must be supplied to the Commission within 30 days of the date of this letter. If this analysis is not received within 30 days, Mobile Satellite Ventures Subsidiary LLC's amendment, File No. SAT-AMD-20031118-00335, will be dismissed without prejudice as incomplete.

Sincerely,

Robert G. Nelson
Chief Engineering Branch
Satellite Division
International Bureau

cc: Bruce D. Jacobs
        Shaw Pittman LLP
        2300 N Street, NW
        Washington, D.C. 20037

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[5] *See* Section 25.140 of the Commission's rules, 47 C.F.R. §25.140. *See also Licensing of Space Stations in the Domestic Fixed-Satellite Service and Related Revisions of Part 25 of the Rules and Regulations,* Report and Order, CC Docket No. 81-704, FCC 83-184, 54 Rad. Reg. 2d 577 (released Aug. 16, 1983); *summary printed in Licensing Space Stations in the Domestic Fixed-Satellite Service,* 48 F.R. 40233 (Sept. 6, 1983) (*Two Degree Spacing Order*).

[6] Submission of the tabular results generated by the Sharp, Adjacent Satellite Interference Analysis (ASIA) program meet the requirement for this analysis.