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Before the  
Federal Communications Commission  
Washington, D.C. 20554

JUL 19 2005

Federal Communications Commission  
Office of Secretary

In the Matter of )  
)  
Mobile Satellite Ventures Subsidiary LLC ) File No. SAT-LOA-19980702-00066  
) File No. SAT-AMD-20001214-00171  
Application for Authority to Launch and ) File No. SAT-AMD-20010302-00019  
Operate an L-band Mobile Satellite Service ) File No. SAT-AMD-20031118-00335  
Satellite at 101° W.L. ) File No. SAT-AMD-20040209-00014  
) File No. SAT-AMD-20040928-00192

**Reply to Opposition to Petition for Clarification or Partial Reconsideration**

Mobile Satellite Ventures Subsidiary LLC ("MSV") hereby files this Reply to the Opposition of PanAmSat Corporation ("PanAmSat") and SES Americom, Inc. ("SES")<sup>1</sup> to MSV's Petition for Clarification or Partial Reconsideration ("Petition")<sup>2</sup> of the International Bureau's ("Bureau") decision granting MSV a license for a next-generation L-band Mobile Satellite Service ("MSS") satellite at 101°W ("MSV-1").<sup>3</sup> In its Petition, MSV asked the Bureau to clarify that the rule requiring Fixed Satellite Service ("FSS") satellites to operate with  $\pm 0.05^\circ$  East-West station keeping does not apply to MSV-1, an MSS satellite, and that MSV is thus permitted to operate MSV-1 with  $\pm 0.1^\circ$  East-West station keeping box subject to coordination with other operators at 101°W.<sup>4</sup> PanAmSat and SES object to this request, arguing that MSV-1

<sup>1</sup> See Opposition of PanAmSat Corporation and SES Americom, Inc., File Nos. SAT-LOA-19980702-00066 et al. (July 7, 2005) ("*Opposition*").

<sup>2</sup> See MSV, Petition for Clarification and Partial Reconsideration, File Nos. SAT-LOA-19980702-00066 et al (June 22, 2005) ("*Petition*").

<sup>3</sup> See *Mobile Satellite Ventures Subsidiary LLC, Order and Authorization*, DA 05-1492 (May 23, 2005) ("*MSV-1 Decision*").

<sup>4</sup> As MSV has explained previously, the unique mass of its satellite and the significant solar pressure on the satellite necessitates a wider station keeping box than other satellites. See MSV, Response, File No. SAT-AMD-20040928-00192 (January 10, 2005), at 3-4 and Technical Appendix.

should operate with  $\pm 0.05^\circ$  East-West station keeping because it will include an FSS payload for feeder links. *Opposition* at 2.

PanAmSat and SES fail to recognize or address that the Commission has already considered in a rulemaking the issue of whether to require MSS satellites to operate with  $\pm 0.05^\circ$  East-West station keeping.<sup>5</sup> In June 2004, the Commission adopted a decision in which it decided not to impose this requirement on MSS satellites.<sup>6</sup> The Commission acknowledged that MSS satellites include an FSS payload for feeder link operations but still refrained from imposing  $\pm 0.05^\circ$  East-West station keeping on MSS satellites.<sup>7</sup> As such, there is no rule requiring MSS satellites to operate with  $\pm 0.05^\circ$  East-West station keeping.

Despite the unsubstantiated claims of PanAmSat and SES, MSV's requested clarification will not result in harmful interference or an overlap with the station-keeping volume of other satellites. MSV is asking the Bureau to clarify that MSV can operate MSV-1 with  $\pm 0.1^\circ$  East-West station keeping provided MSV coordinates with operators at  $101^\circ\text{W}$ . Any issues pertaining to harmful interference or overlap of station-keeping volume can be resolved during coordination among the affected operators.<sup>8</sup>

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<sup>5</sup> See *Mitigation of Orbital Debris, Notice of Proposed Rulemaking*, IB Docket No. 02-34, FCC 02-80, 17 FCC Rcd 5586 (2002).

<sup>6</sup> See *Mitigation of Orbital Debris, Second Report and Order*, IB Docket No. 02-54, FCC 04-130 (June 21, 2004), at ¶ 44 (“We decline, at this time, to adopt changes to Section 25.210(j) to specify a longitudinal tolerance of  $\pm 0.05^\circ$  for all space stations, including MSS and remote sensing space stations.”).

<sup>7</sup> *Id.*

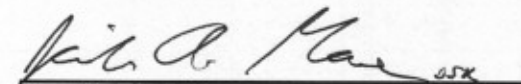
<sup>8</sup> MSV notes that there are no satellites using MSV's Appendix 30B Ku-band frequencies within over 5 degrees of  $101^\circ\text{W}$ ; thus, PanAmSat's and SES's claims of “harmful interference” resulting from a wider station keeping box are unfounded.

For the foregoing reasons, MSV asks that the Bureau deny the Opposition of PanAmSat and SES and proceed to issue MSV's requested clarification.

Respectfully submitted,



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Dated: July 19, 2005

## CERTIFICATE OF SERVICE

I, Sylvia A. Davis, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that on this 19th day of July 2005, served a true copy of the foregoing by first-class United States mail, postage prepaid, upon the following:

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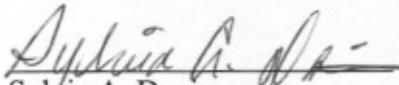
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