

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	IB Docket No. 11-109
Comment Sought on Ligado’s)	SAT-AMD-20180531-00044
Modification Applications)	SAT-AMD-20180531-00045
)	
To: The Commission)	

REPLY COMMENTS OF INMARSAT INC.

Inmarsat Inc. (“Inmarsat”) files these reply comments to address the record with respect to the above-referenced amended applications of Ligado Networks LLC (“Ligado”) to modify the ancillary terrestrial component (“ATC”) of its L-band mobile satellite service networks (the “Modification Applications”). Inmarsat employs L-band spectrum to provide critical services and capabilities to users in the maritime, aviation, military, public safety, media, energy, and other sectors. Inmarsat supports the grant of the Modification Applications, and urges the Commission to act upon them promptly.

In initial comments, a commenter suggested that Ligado’s proposed operations could interfere with Inmarsat’s operations and asked for details as to how Ligado or Inmarsat would address this issue. Ligado’s Modification Applications and the present amendment make clear Ligado’s commitment to resolving interference. Inmarsat shares that commitment.

The proposed operations will comply with the Commission’s rules. Additionally, the ATC system will be deployed subject to an inter-operator cooperation agreement with Inmarsat, which provides a basis to address the interference concerns about Inmarsat transceivers going forward.

To the extent that terminals on Inmarsat's network would need to be upgraded as part of Ligado's network deployment, the specifics of how this will be accomplished can be left to the parties to determine through established processes. Technical discussions and standards will continue in expert groups such as the Airline Electric Engineering Committee (AEEC).

CONCLUSION

For the foregoing reasons, Inmarsat urges the Commission to grant Ligado's amended Modification Applications promptly.

Respectfully submitted,

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