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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 9, 2001

Via Hand Delivery

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20054

Received

OCT 15 2001

Satellite Policy Branch
International Bureau

**RE: Motient Services Inc. and Mobile Satellite Ventures Subsidiary LLC;
File No. SAT-ASG-20010302-00017 et. al;
TMI Communications and Company, Limited Partnership
File No. SES-ASG-20010116-00099 et. al**

Dear Ms. Salas:

In March 2001, Motient Services Inc. ("Motient") and TMI Communications and Company, Limited Partnership ("TMI") filed the above-captioned applications to assign various FCC licenses and authorizations to Mobile Satellite Ventures Subsidiary LLC ("MSV Sub"), a Delaware limited liability company. As indicated in the applications, MSV Sub will be a wholly-owned subsidiary of Mobile Satellite Ventures L.P. ("MSV LP"), a Delaware limited partnership. MSV LP will be managed by a Delaware corporate general partner, Mobile Satellite Ventures GP Inc. ("MSV GP Inc.").

In the applications, the applicants stated that TMI, a Canadian limited partnership, would have a 27.2% interest in MSV LP. In addition, the applicants estimated that the overall foreign ownership of MSV LP would not exceed 35%. (The additional approximately eight percent of additional foreign ownership was estimated by multiplying the estimated foreign ownership of Motient and each new investor by the percentage interest each will hold in MSV LP. Motient Corporation, a publicly traded company, estimated its foreign ownership at 5%. The funds affiliated with Columbia Capital, LCC estimated foreign ownership at approximately 30%; the funds affiliated with Spectrum Equity Investors LP estimated foreign ownership at zero to approximately 19% depending upon the fund; and funds affiliated with Telcom Ventures, LLC did not have any foreign ownership.) Because the indirect foreign ownership of MSV Sub would exceed 25%, the applicants requested a declaratory ruling pursuant to Section 310(b)(4) of the Communications Act that MSV Sub's indirect foreign ownership in excess of 25% would serve the public interest.

Since the filing of the applications, the details of the transaction have changed such that the transfer may occur initially without any further investment by the new investors. If this occurs, then for a period of time, the ownership percentage held by Motient and TMI will

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increase proportionally and TMI's ownership interest in MSV LP could be as high as forty percent.

In light of the foregoing, the applicants' request in the above-captioned applications to exceed the foreign ownership benchmark of Section 310(b)(4) should reflect TMI's potential interest of approximately 40% in MSV LP.

Please contact the undersigned with any questions or concerns.

Very truly yours,



Lon C. Levin

cc: Lisa Choi