Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Application for Review of LOIs of	
ICO Services Limited;	DA 01-1635 File No. 188-SAT-LOI-97
The Boeing Company;	DA 01-1631 File No. 179-SAT-P/LA-97(16)
Celsat America, Inc.;	DA 01-1632 File No. 26/27/28-DSS-P-94
Constellation Communication Holdings, Inc.;	DA 01-1633 File No. 181-SAT-P/LA-97(46)
Globalstar, L.P.;	DA 01-1634 File No. 181/184/185/186-SAT-P/LA-97
Iridium LLC;	DA 01-1636 File No. 187-SAT-P/LA-97(26)
Mobile Communications Holdings, Inc.;	DA 01-1637 File No. 180-SAT-P/LA-97(26)
TMI Communications and Company, Limited Partnership	DA 01-1638 File No. 189-SAT-LOI-97

OPPOSITION OF ICO SERVICES LIMITED

ICO Services Limited ("ICO")[1] strongly opposes the application for review ("Application") filed jointly by AT&T Wireless Services, Inc., Cingular Wireless LLC, and Verizon Wireless ("Petitioners") seeking reversal of the authorizations granted to eight 2 GHz mobile satellite service providers ("License Orders") in the above-captioned

1 ICO, a wholly owned subsidiary of ICO-Teledesic Holdings Limited. ICO's Letter of Intent ("LOI") to Access 2 GHz MSS Frequency Bands at 1990-2025/2165-2200 MHz (SAT-LOI-19970926-00163 (as amended)) was granted by the International Bureau on July 17, 2001. *See ICO Services Limited*, Order, DA 01-1635 (rel. July 17, 2001) ("*ICO License Order*").

proceedings on July 21, 2001, by the Federal Communications Commission's ("FCC" or "Commission") International Bureau ("Bureau").[2]

INTRODUCTION

The Application is both procedurally and substantively deficient. The Petitioners have not and cannot demonstrate that they have been aggrieved by the Bureau's decisions, as required under Section 1.115 of the Commission's rules, 47 C.F.R. § 1.115. Even if the Petitioners could demonstrate the requisite standing to object to the Bureau's decision, the substance of their objections rests on purely speculative and irrelevant observations about the health and competitiveness of the MSS industry and thus lacks merit. What Petitioners seek, in fact, is a reallocation of the 2 GHz MSS spectrum in the guise of an application for review. Thus, stripped of its label, the Application is merely an untimely petition for reconsideration of the Commission's 2 GHz MSS allocation and service rule proceedings and must be summarily dismissed. Moreover, the full Commission on August 30, 2001, three days after the Application was filed, denied a petition filed by the Cellular Telecommunications & Internet Association ("CTIA") insofar as it sought reallocation of the entire 2 GHz MSS band and a delay in authorizing 2 GHz MSS systems. Accordingly, the Application is moot.

I. THE PETITIONERS LACK STANDING TO OBJECT TO THE BUREAU'S ORDERS GRANTING THE 2 GHZ MSS LICENSES

As a threshold matter, the Petitioners lack standing to object to the Bureau's License Orders. Section 1.115 of the Commission's rules requires any party filing an

---

[2] In the 2 GHz MSS processing rounds, applicants filed applications for U.S.-licensed systems and LOIs for non-U.S.-licensed systems. For ease of reference, ICO's opposition will refer to these collectively as "applications."

application for review that has not previously participated in the proceeding at issue to include in its application, "a statement describing with particularity the manner in which he is aggrieved by the action taken and showing good reason why it was not possible for him to participate in the earlier stages of the proceeding." Section 1.115 further requires that applications failing to make an adequate showing in this regard be dismissed.[3]

Nowhere in the Application is there any demonstration that the Petitioners have been aggrieved by any one of the Bureau's License Orders. The Application similarly fails to explain why the Petitioners did not participate in the 2 GHz MSS license processing rounds. Accordingly, the Application must be dismissed.

Under long-standing precedent for demonstrating "aggrievement," the Petitioners cannot show that they were aggrieved by the Bureau's orders. As the Commission and the courts consistently have held, petitioners that "fail to identify any direct economic or other connection between their interests and grant of the applications, lack standing under the Commission's rules to file an application for review."[4] The Petitioners have no

---

[3] *See, e.g., Advanced Communications Corporation*, Memorandum Opinion and Order, 11 FCC Rcd 3399, 3407 ¶ 16 (1995) (dismissing as without standing applications for review filed by parties that failed to participate in the first stage of a satellite licensing proceeding and who failed to show good reason why it was not possible for them to participate in such stage).

[4] *Application of Lawrence and Nayereh Wrathall D/B/A Hanford FM Radio*, Memorandum Opinion and Order, 11 FCC Rcd 8509, 8511 ¶ 4 (1996) ("*Hanford FM Radio*"). As the Commission further concluded, "where no nexus [sic] between challenged application and applicant for review, such applicant is not 'aggrieved' for purposes of 47 C.F.R. § 1.115(a)" *Id.* (*citing Applications of Clarke Broadcasting Corporation*, Memorandum Opinion and Order, 11 FCC Rcd 3057 (1996)). *See also, Mobile Relay Associates, Inc.*, 16 FCC Rcd 4320 ¶ 2 (2001) (*citing AmericaTel Corporation*, 9 FCC Rcd 3993 (1995)) ("An essential element of standing is that the petitioner must allege facts sufficient to show that grant of the application that it opposes would cause petitioner a direct injury"); *Applications of WINV, Inc. and WGUL-FM, Inc.*, 14 FCC Rcd 2032, 2033 ¶ 3 (1998) (*citation omitted*) ("In order to show that it is 'aggrieved' by an action taken pursuant to delegated authority, as required by 47 C.F.R. § 1.115(a), an applicant for review must demonstrate an actual or threatened injury to itself as a direct result of the challenged action."); *Warren Ache*, Memorandum Opinion and Order, 9 FCC Rcd 2464, 2466-67 ¶ 7 (1993) (*citations omitted*) ("A party seeking to establish standing to file a petition to deny must demonstrate not only a direct or threatened 'distinct and palpable injury', but also a causal link 'between the claimed injury and the

Footnote continues....

connection with the 2 GHz MSS licensing process and have no legally cognizable interest in the MSS spectrum.[5] The Petitioners are not applicants or competitors for 2 GHz MSS spectrum.[6] Lacking any legal interest in the 2 GHz MSS applications, Petitioners do not and cannot show they were harmed in any way by the Bureau's Licensing Orders.

Rather, the Petitioners merely speculate that MSS licensees will not ultimately use their spectrum and assert on that basis that the MSS spectrum should be made available to terrestrial CMRS providers. As the Commission and the courts consistently have held, however, to establish a direct injury, the harm to the petitioner must be "both certain and great: it must be actual and not theoretical."[7] Whether any or all of the MSS licensees ultimately meet the 2 GHz MSS milestones is a matter of pure conjecture and irrelevant

---

challenged action.' The causal link must be demonstrated by establishing: (1) that the injury can be traced to the challenged action; and (2) that the injury would be prevented or redressed by the relief requested."); *Applications of AirGate Wireless, L.L.C. and Cricket Holdings, Inc.*, Memorandum Opinion and Order, 14 FCC Rcd 11827, 11844 ¶ 35 (1999); *Applications of KOLA, INC. and Ray M. Stanfield*, Memorandum Opinion and Order, 11 FCC Rcd 14297, 14302-03 ¶ 10 (1996).

5 *See, e.g., Applications of Global Broadcasting Group, Inc.*, Memorandum Opinion and Order, 10 FCC Rcd 5437, 5438 ¶ 6 (1995) (in which the Commission concluded that even an interim operator in the spectrum at issue "has no legally cognizable interest affected by grant of a [minor] modification application filed by the permanent licensee," and therefore, lacks standing to file an application for review.); *Applications of Louisiana RSA No. 8 Limited Partnership*, Order, 12 FCC Rcd 20182, 20186 ¶ 12 (1997).

6 *See, e.g., Applications of Sevier Valley Broadcasting, Inc. and Mid-Utah Radio, Inc.*, Memorandum Opinion and Order, 10 FCC Rcd 9795, 9796 ¶ 6 (1995).

7 *Wisconsin Gas Co. v. FERC*, 758 F.2d 669, 674 (D.C. Cir. 1985) (*per curiam*). *See also Application of MEL-EAU Broadcasting Corp and WMEG, Inc..*, Memorandum Opinion and Order, 10 F.C.C.2d 537, 538 ¶ 4 (1967) ("[P]leading 'standing' by speculation and conjecture is not acceptable."); *See Applications of Butte County Cellular License Corp.*, Memorandum Opinion and Order, 8 FCC Rcd 7894 ¶ 3 (1993) (wherein the Commission held that "[a] mere stated intent to file an application in a particular market, as opposed to an actual interest in a filed application" was to speculative to provide standing); *Application of KIRV Radio, Inc. and New Life Enterprises, Inc.*, 50 F.C.C.2d 1010 ¶ 2 (1975) (holding that potential economic injury by a mere applicant for a broadcast facility is too remote and speculative to show standing as a "party in interest," and petitioner had merely signed a contract to acquire a broadcast facility did not even qualify as a mere applicant); *Application of Wireless Co., L.P.*, Order, 10 FCC Rcd 13233 (1995).

to the Commission's established criteria for granting 2 GHz MSS authorizations.[8] Even if in the unlikely event none of the 2 GHz MSS licensees ultimately meets the milestones, no harm would result to the Petitioners because they have no legally cognizable interest in the 2 GHz MSS spectrum.[9]

The Petitioners also fail to provide any reason why it was not possible for them to participate in the earlier stages of the 2 GHz MSS processing rounds at issue, specifically, the ICO LOI. The ICO LOI was pending for more than four years, and the Petitioners had ample opportunities to raise objections. The 2 GHz MSS licensees initially filed applications and LOIs in September 1997, all of which were subject to public notice and provided opportunity for public comment. Most recently, 2 GHz MSS applicants filed amendments to their applications last fall in order to bring them into compliance with the new 2 GHz MSS service rules. Not one of the Petitioners raised any objections to the amendments during that comment cycle.

Moreover, the full Commission denied in the *3G FNPRM* the same request by CTIA that the Bureau's 2 GHz MSS Licensing Orders be vacated and held in abeyance.[10] In that proceeding, the Commission entertained CTIA's petition, but expressly denied it

---

[8] *Establishment of Policies and Service Rules for the Mobile Satellite Service in the 2 GHz Band*, Report and Order, 15 FCC Rcd 16127 (2000) ("*2 GHz MSS Order*").

[9] That Petitioners seek the 2 GHz MSS spectrum for their own purposes is insufficient to confer standing. *See Applications of Butte County Cellular License Corp.*, Memorandum Opinion and Order, 8 FCC Rcd 7894 ¶ 3 (1993) (wherein the Commission held that "[a] mere stated intent to file an application in a particular market, as opposed to an actual interest in a filed application" was too speculative to provide standing).

[10] *Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, Including Third Generation Wireless Systems*, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, ET Docket No. 00-258, FCC 01-224 (rel. Aug. 20, 2001) ("*3G FNPRM*").

"insofar as it requests reallocation of the entire 2 GHz MSS band and a delay in authorizing of 2 GHz MSS systems."[11] Accordingly, the Application is moot.

Finally, the Application's underlying rationale -- that "intervening circumstances have undermined the original basis for the allocation" -- amounts to a challenge not of the Bureau's decision, but rather the Commission's underlying 2 GHz MSS spectrum allocation rulemaking proceeding. It is well established that an application for review cannot be used to challenge rulemaking decisions.[12]

II. THE APPLICATION LACKS MERIT AND MUST BE DISMISSED

Section 1.115 of the Commission's rules requires that applications for review specify with particularity one or more of the following factors that warrant Commission consideration of the questions presented:

1) The action taken pursuant to delegated authority is in conflict with statute, regulation, case precedent, or established Commission policy;
2) The action involves a question of law or policy which has not previously been resolved by the Commission;
3) The action involves application of a precedent or policy which should be overturned or revised;
4) An erroneous finding as to an important or material question of fact; and/or
5) Prejudicial procedural error.

As demonstrated below the Application fails to show that any of the above-listed factors applies.

---

11 *Id.* ¶ 23.

12 *See, e.g., Digital Broadcasting OVS Certification to Operate Open Video System*, Order On Review, 12 FCC Rcd 20764, 20768 ¶ 11 (1997) (*citation omitted*) ("The Commission's application for review process is not intended too revisit issues resolved in its rulemaking decisions.").

A. The Bureau's MSS License Orders Complied With Applicable Law and Commission Policies

The Petitioners erroneously contend that the Bureau engaged in unreasoned decision making because it did not examine whether "a full 70 MHz allocation for MSS is warranted and in the public interest" in light of ICO's statement regarding its proposed ancillary terrestrial component ("ATC") and the general state of the MSS industry. In fact, the Bureau based its decisions in the License Orders upon the policies set forth by the full Commission in the 2 GHz MSS allocation rulemaking proceeding.[13] For its part, the Commission has not wavered in acknowledging the substantial public benefits of MSS service, particularly to rural and underserved areas.[14]

---

[13] Petitioners' assertions that (i) the MSS licensees must comply with the Commission's auction rules if the Commission ultimately adopts ICO's ATC proposal, and (ii) the Bureau erred in adopting a band plan that reserves spectrum solely for MSS use, are beyond the scope of the License Orders and are currently being addressed in separate proceedings.

[14] In allocating the 2 GHz band to MSS, for example, the Commission found that MSS will "provide another option for mobile communications, and would provide communications to underserved areas, such as rural and remote areas where PCS, cellular, and other mobile services are less feasible." *Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for Use by the Mobile-Satellite Service*, First Report and Order and Further Notice of Proposed Rulemaking, 12 FCC Rcd 7388, 7395 ¶ 13 (1997). In reconsideration of its decision to allocate 2 GHz to MSS, the Commission affirmed that "the advent of ubiquitous MSS service will [offer]...benefits of robust competition among service providers." *Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for Use by the Mobile-Satellite Service*, Memorandum Opinion and Order and Third Notice of Proposed Rulemaking, 13 FCC Rcd 23949, 23954 ¶ 11 (1998) (*citation omitted*). More recently, the Commission found that 2 GHz MSS systems: "will provide new and expanded regional and global data, voice, and messaging services . . . will enhance competition in mobile satellite and terrestrial communications services, and complement wireless service offerings through expanded geographic coverage . . . and will thereby promote development of regional and global communications to unserved communities in the United States, its territories and possessions, including rural and Native American areas, as well as worldwide." *2 GHz MSS Order* at 16128-29 ¶ 1.

Virtually all of the arguments raised in the Application were raised by the Petitioners in an *ex parte* letter submitted in each of the then-pending MSS licensee files.[15] The Bureau considered and properly rejected these contentions:

> The Wireless Carriers provide no credible information to demonstrate that the findings made by the Commission last year that 2 GHz MSS is in the public interest are called into question. The 2 GHz MSS applicants continue to pursue their proposed systems based upon amended applications consistent with the Commission's *2 GHz MSS Order*. They should be given the opportunity to succeed or fail in the market on their own merits after expending vast resources over nearly a decade of effort in the ITU and through regulatory proceedings to get this opportunity. A delay in issuance of the licenses would not be in the public interest where it would adversely affect the introduction of competition and new services.

The Bureau provided a reasoned explanation for rejecting Petitioners' claims.

The Petitioners' assertion that the Bureau "failed to resolve major factual issues" in violation of section 309(j) of the Communications Act of 1934 is equally without merit. First, as detailed above, the Bureau addressed the "major factual issues" cited by Petitioners and properly found them to be without merit. Second, the Petitioners' contention that these facts show that MSS will not be viable is both incorrect and irrelevant to the 2 GHz MSS License Orders. The Bureau found that ICO and the seven other MSS licensees satisfied all application requirements and all technical qualifications set forth in the Commission's rules and, therefore, grant of the MSS applications was fully consistent with the Commission's *2 GHz MSS Order*. Moreover, the Commission's 2 GHz MSS licensing rules rely upon construction milestones to ensure that MSS licensees will meet the general public interest goal of putting spectrum to use in a

---

15 *See* Letter to Michael K. Powell, Chairman, Federal Communications Commission from Douglas Brandon, AT&T Wireless Services, Inc., Brian F. Fontes, Cingular Wireless, LLC, Luisa L. Lancetti, Sprint Corporation, and John T. Scott, III, Verizon Wireless, IB Docket No. 99-81 (dated June 13, 2001) (*citing* the ICO *Ex Parte* Letter and CTIA Petition).

reasonably timely fashion. Compliance with the milestones is evaluated when the milestone is reached -- not when the license is granted.[16] None of the "factual issues" cited by the Petitioners establishes that any of the eight MSS licensees will be unable to meet its milestone obligations at the time of the milestone. The fact that ICO has already met the first and second milestones -- two years ahead of time -- belies the Petitioners' predictions.[17] As the Commission has emphasized, commencement of satellite construction demonstrates a commitment by the licensee to proceed with its proposed system.[18]

B. ICO's ATC Proposal Was Not An Amendment To Its LOI

Petitioners are wrong that ICO's *ex parte* proposal to authorize an ancillary terrestrial component for MSS systems constituted a major amendment to its original LOI, which the Bureau was obligated to seek public comment upon prior to granting ICO's MSS license. Amendments to a satellite system application must be submitted in the same manner as the original application.[19] ICO's *ex parte* letter simply proposed a generally applicable amendment to the MSS service rules that would affect all MSS licensees on a prospective basis. Any amendments to an application or modifications to a license would be required only if the

---

16 *See* 47 C.F.R. § 25.143(e)(2) (*emphasis added*) ("All operators of 1.6/2.4 GHz mobile-satellite systems shall, within 10 days *after* a required implementation milestone as specified in the system authorization, certify to the Commission by affidavit that the milestone has been met . . . .").

17 The *ICO License Order* requires ICO to enter into a non-contingent satellite manufacturing contract on or by July 17, 2002, and complete critical design review of its system on or by July 17, 2003, both of which ICO has already accomplished. *ICO License Order* ¶ 34.

18 *See, e.g., Columbia Communications Corporation*, Memorandum Opinion and Order, 15 FCC Rcd 16496, 16502 ¶ 16 (2000); *AMSC Subsidiary Corporation Applications to Modify Space Station Authorizations in the Mobile Satellite Service*, Memorandum Opinion and Order, 8 FCC Rcd 4040, 4042 ¶ 13 (1993); *Norris Satellite Communications, Inc., Application for Review of Order Denying Extension of Time to Construct and Launch Ka-Band Satellite System*, Memorandum Opinion and Order, 12 FCC Rcd 22299, 22306-07 ¶ 17 (1997).

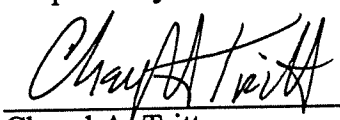
19 *See* 47 C.F.R. §§ 25.116(d), 25.117(d).

Commission adopts ICO's proposals. In any event, the opportunity for public notice and comment that Petitioners seek has been provided in the recently initiated *ATC NPRM* proceeding.[20]

CONCLUSION

The International Bureau properly considered the eight applications at issue in reliance on established policy and precedent, made no erroneous findings and committed no prejudicial procedural errors. For the reasons stated above, the Application fails to satisfy the procedural and substantive requirements set forth under Section 1.115 of the Commission's rules and must be dismissed expeditiously.

Respectfully submitted,



Cheryl A. Tritt
David Munson
MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006
(202) 887-1500

Counsel for ICO Services Limited

Larry Williams
Suzanne Hutchings

ICO-Teledesic Global Ltd.
1730 Rhode Island Avenue, N.W.
Suite 1000
Washington, D.C. 20036
(202) 721-0967

August 31, 2001

---

20 *See Flexibility for Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band in the L-Band, and the 1.6/2.4 GHz Band*, Notice of Proposed Rulemaking, IB Docket No. 01-185, FCC 01-225 (rel. Aug. 17, 2001) ("*ATC NPRM*").

CERTIFICATE OF SERVICE

I, Theresa Pringleton, do hereby certify that copies of the foregoing **OPPOSITION OF ICO SERVICES LIMITED** were delivered on this 31st day of August, 2001, to the following:

Chairman Michael K. Powell
Federal Communications Commission
445 12th Street, SW, 8th Floor
Washington, DC 20554

Commissioner Kathleen Q. Abernathy
Federal Communications Commission
445 12th Street, SW, 8th Floor
Washington, DC 20554

Commissioner Kevin J. Martin
Federal Communications Commission
445 12th Street, SW, 8th Floor
Washington, DC 20554

Douglas I. Brandon
AT&T Wireless Services, Inc.
1150 Connecticut Avenue, NW
Washington, DC 20036

J.R. Carbonell
Carol T. Tacker
David G. Richards
Cingular Wireless LLC
5565 Glenridge Connector, Suite 1700
Atlanta, GA 30342

Robert E. Conn
Bruce D. Jacobs
David S. Konczal
Paul Cicelski
Shaw Pittman Potts & Trowbridge
2300 N Street, NW
Washington, DC 20037

Commissioner Gloria Tristani
Federal Communications Commission
445 12th Street, SW, 8th Floor
Washington, DC 20554

Commissioner Michael J. Copps
Federal Communications Commission
445 12th Street, SW, 8th Floor
Washington, DC 20554

John T. Scott, III
Cellco Partnership d/b/a Verizon Wireless
1300 I Street, NW, Suite 400-W
Washington, DC 20005

William D. Wallace
Crowell & Moring LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004

Lon C. Levin
Vice President and Regulatory Counsel
Motient Services, Inc.
10802 Park Ridge Boulevard
Reston, VA 20191

R. Craig Holman
Office of the Group Counsel
Space and Communications Group
The Boeing Company
P.O. Box 3999, M/S 84-10
Seattle, WA 98124-2499

Joseph P. Markoski
Herbert E. Marks
David A. Nall
Bruce A. Olcott
Squire, Sanders & Dempsey LLP
1201 Pennsylvania Avenue, NW
P.O. Box 407
Washington, DC 20044-0407

Adam D. Krinsky
Senior Legal Advisor
Office of Commissioner Gloria Tristani
Federal Communications Commission
445 12th Street, SW, Room 8-B115
Washington, DC 20554

Sam Feder
Senior Legal Advisor
Office of Commissioner Kevin Martin
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, DC 20554

William W. Kunze, Chief
Commercial Wireless Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C236
Washington, DC 20554

Donald Abelson, Chief
International Bureau
Federal Communications Commission
445 12th Street, SW, 6th Floor
Washington, DC 20554

Raymond G. Bender, Jr.
Carlos M. Nakla
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036

Peter Tenhula
Senior Legal Advisor
Office of Chairman Michael K. Powell
Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, DC 20554

Bryan Tramont
Senior Legal Advisor
Office of Commissioner Kathleen Abernathy
Federal Communications Commission
445 12th Street, SW, Room 8-A204
Washington, DC 20554

Jordan Goldstein
Senior Legal Advisor
Office of Commissioner Michael Copps
Federal Communications Commission
445 12th Street, SW, Room 8-A302
Washington, DC 20554

Bruce A. Franca, Acting Chief
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW, Room 4-C236
Washington, DC 20554

John L. Bartlett
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

James C. Pachulski
Verizon
1320 North Courthouse Road, 8th Floor
Arlington, VA 22201

Philip Malet
Steptoe & Johnson, LLP
1330 Connecticut Avenue, NW
Washington, DC 20036

Peter D. Sloane
Office of the Group Counsel
Information, Space & Defense Systems Group
The Boeing Company
P.O. Box 3999, M/S 84-10
Seattle, WA 98124

Cheryl Lynn Schneider
Chief Regulatory Counsel, Americas
BT North America, Inc.
601 Pennsylvania Avenue, NW
Washington, DC 20006

John C. Quayle
Antionette Cook Bush
Brian D. Weimer
Skadden Arps Slate Meagher & Flom
1440 New York Avenue, NW
Washington, DC 20005

David D. Otten
President and CEO
CELSAT America, Inc.
3460 Torrance Blvd., Suite 220
Torrance, CA 90503

Gregory C. Staple
R. Edward Price
Robert A. Mazer
Albert Shuldiner
Vinson & Elkins
1455 Pennsylvania Avenue, NW
Washington, DC 20004

Karen E. Watson
Director Government Relations
Echostar Communications Corporation
1850 M Street, NW, Suite 1070
Washington, DC 20036

Nils Rydbeck
Vice President Research & Development
Ericcson Mobile Phones & Terminals
7001 Development drive
Research Triangle Park, NC 27709

Mitchell Lazarus
James P. Riley
Frank R. Jazzo
Eric Fishman
Fletcher, Heald & Hildreth, PLC
1300 North 17th Street, 11th Floor
Arlington, VA 22209

Peter A. Rohrbach
Karis A. Hastings
Hogan & Hartson, LLP
555 13th Street, NW
Washington, DC 20004

F. Thomas Tuttle, General Counsel
Iridium LLC
1575 Eye Street, NW, Suite 500
Washington, DC 20005

Gary M. Epstein
John P. Janka
James H. Barker
Latham & Watkins
1001 Pennsylvania Avenue, NW, Suite 1300
Washington, DC 20004

Scott B. Tollesfson
Hughes Communications, Inc.
200 N. Sepulveda Blvd.
El Segundo, CA 90245

Thomas J. Keller
Julian L. Shepard
Eric T. Werner
Verner, Lipfert, Bernhard, McPherson & Hand
901 15th Street, NW, Suite 700
Washington, DC 20005

Gerald Musarra
Space and Strategic Missiles Sector
Lockheed Martin Corporation
1725 Jefferson Davis Highway, Suite 403
Arlington, VA 22202

Jill Abehouse Stern
Gerald B. Helman
Mobile Communications Holdings, Inc.
Two Lafayette Center
1133 21st Street, NW
Washington, DC 20036

Phillip A. Spector
Jeffrey H. Olson
Diane C. Gaylor
Patrick S. Campbell
Kira Merski
Paul, Weiss, Rifkind, Wharton & Garrison
1615 L Street, NW, Suite 1300
Washington, DC 20036

Henry Goldberg
Joseph A. Godles
Mary J. Dent
Goldberg, Godles, Werner & Wright
1229 19th Street, NW
Washington, DC 20036

Denis Couillard
Telecommunications Industry Association
2500 Wilson Blvd., Suite 300
Arlington, VA 22201

Mark A. Grannis
Harris Wiltshire & Grannis
1200 18th Street, NW
Washington, DC 20036

Marvin Rosenberg
Holland & Knight
2100 Pennsylvania Avenue, NW
Washington, DC 20037

Norman P. Leventhal
Walter P. Jacob
Leventhal, Senter & Lerman, PLC
2000 K Street, NW, Suite 600
Washington, DC 20006

Andrew Krieg
Wireless Communications Association International, Inc.
1140 Connecticut Avenue, NW
Suite 810
Washington, DC 20036

Paul J. Sinderbrand
Wilkinson Barker & Knauer
2300 N Street, NW
Washington, DC 20037

Henry L. Baumann
Jack N. Goodman
Kelly Williams
National Association of Broadcasters
1771 N Street, N.W.
Washington, D.C. 20036

Victor Tawil
Senior Vice President
Association for Maximum Service
Television, Inc.
1776 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Jonathan D. Blake
Ellen Goodman
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20007

Joan M. Griffin
Kelley Drye & Warren LLP
1200 19th Street, NW, Suite 500
Washington, DC 20036

Theresa Pringleton