



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

October 22, 2003

In Reply Refer To:
File No. SAT-MOD-20030828-00286

Via Fax (202-719-7049) and U.S. Mail

Mr. Peter D. Shields
Wiley Rein & Fielding LLP
1776 K Street, N.W.
Washington, D.C. 20006

Re: Iridium 2GHz LLC
Application for Modification and Public Interest Demonstration (S2325)

Dear Mr. Shields:

On August 28, 2003, you filed with the Commission, as counsel to Iridium 2GHz LLC (Iridium), an application to modify Iridium's authorization to launch and operate a Mobile-Satellite Service ("MSS") network in the 2 GHz MSS band.¹ An examination of the application shows that Iridium did not respond to question 40 of FCC Form 312, viz.:

If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.


Iridium is a Limited Liability Company ("LLC"), *i.e.*, not a "corporation" *per se*. Rather, LLCs are, in general, unincorporated associations that possess attributes of both corporations and partnerships. We believe that, in addition to corporations, the request in question 40 is relevant to business associations that possess the attributes of corporations, irrespective of how that entity is organized for liability or tax purposes. Therefore, the information requested in question 40 is needed in order for the Commission to complete its analysis and make the necessary public interest findings.

¹ Application of Iridium 2GHz LLC, File No. SAT-MOD-20030828-00286 (August 28, 2002) (Application), seeking modification to *Iridium LLC*, Order and Authorization, DA 01-1636, 16 FCC Rcd 13778 (Int'l Bur. 2001), *modified*, *Iridium 2GHz LLC*, Order, DA 03-2075, 18 FCC Rcd 12335 (Int'l Bur. 2003).

Mr. Peter D. Shields
October 22, 2003
Page 2

Accordingly, pursuant to section 308(b) of the Act,² we request that you amend your FCC Form 312 application to provide a written response to question 40. If there has been no change in ownership since Iridium's last disclosure, an affirmative statement to that effect, with cross-reference to the file number(s) and/or Order(s) containing such disclosure, is sufficient. Your amendment should be filed with Marlene H. Dortch, Secretary, Federal Communications Commission and reference the applicable file number above. Please submit your filing no later than November 3, 2003, with an electronic courtesy copy to Howard Griboff by email (Howard.Griboff@fcc.gov) or facsimile (202-418-4422). Failure to provide this information by that date will result in return of the application for modification as an incomplete filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas S. Tycz", with a long horizontal stroke extending to the right.

Thomas S. Tycz
Chief, Satellite Division
International Bureau

² 47 U.S.C. § 308(b).