

**ShawPittman** LLP

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May 21, 2004

RECEIVED

**Via Hand Delivery**  
Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

MAY 21 2004

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Received  
JUN 07 2004

Policy Branch  
International Bureau

**Re: Mobile Satellite Ventures Subsidiary LLC**  
**Ex Parte Presentation**  
**IB Docket No. 01-185**  
**File No. SAT-MOD-20031118-00333 (ATC application)**  
**File No. SAT-AMD-20031118-00332 (ATC application)**  
**File No. SES-MOD-20031118-01879 (ATC application)**  
**File No. SAT-AMD-20040209-00014 (replacement satellite application)**  
**File No. SAT-AMD-20031118-00335 (replacement satellite application)**

Dear Ms. Dortch:

On May 20, 2004, Gary Parsons, Chairman of the Board of Mobile Satellite Ventures LP ("MSV"); Alex Good, Chief Executive Officer of MSV; Lon Levin, Vice President of MSV; and Bruce Jacobs of Shaw Pittman LLP met with the following International Bureau staff members: Donald Abelson, James Ball, Anna Gomez, Karl Kensinger, Paul Locke, Roderick Porter, Steven Spaeth, and Thomas Tycz. MSV presented the information contained in the attached set of presentation materials.

Please direct any questions regarding this matter to the undersigned.

Very truly yours,

  
David S. Konczal

cc: Donald Abelson  
James Ball  
Anna Gomez  
Karl Kensinger  
Paul Locke  
Roderick Porter  
Steven Spaeth  
Thomas Tycz

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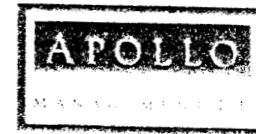


# Ubiquitous Mobile Satellite Service

MSV's Next Generation System

May 20, 2004

# Ownership and Management



Telcom  
Ventures Inc.

- Operating investors: broad experience developing and operating mobile and satellite systems
- Financial investors: extensive investments in communications and satellite enterprises with billions of dollars under management
- Management: experience includes operations of satellite and wireless businesses



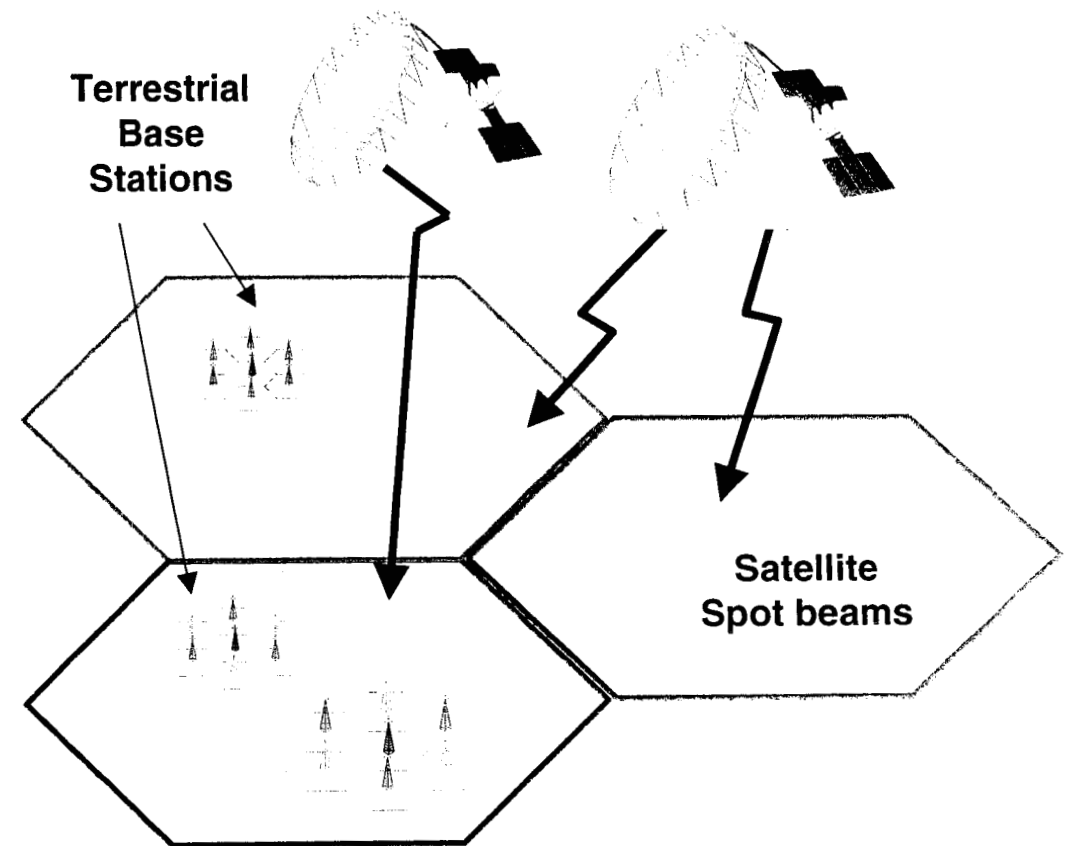
# Existing Satellite Business



- Two geostationary satellites
- North America-wide service
  - Voice, including push-to-talk
  - Packet Data
  - Dispatch
- Cash flow positive, over \$30M in annual revenue
- Over 100,000 end-users, including hundreds of public safety agencies

# Next Generation Vision

- Ubiquitous 3G wireless communications services throughout North America
- Low cost, lightweight handsets, indistinguishable from standard cellphones and PDAs
- Dramatically alters wireless services in rural areas



# Expected Demand Is Substantial

**Our next-generation functionality and applications insure strong demand**

Public Safety & Security	1.0 - 1.5 million customers
Consumer Voice/Streaming IP	5.0 - 10.0 million customers
Commercial Data/Enterprise Telematics	1.0 - 1.5 million customers
Consumer Telematics	3.5 - 5.0 million customers

**Our end-user pricing make this a mass market product**

- User equipment \$100-200
- Average monthly costs <\$50 per user

# Ready to Move Forward

- 1995** Launch of current system
- 2000** Critical concept and technology development (ongoing)
- 2001** Filing of initial application for replacement satellites and terrestrial authority
- 2002** File patent applications to protect key intellectual property (ongoing)  
Demonstration and procurement discussions with satellite, handset, and infrastructure manufacturers (ongoing)  
Agreement with US GPS Industry Council
- 2003** Develop vertical applications (ongoing)  
Issue RFIs to satellite and infrastructure vendors  
Begin discussions with anchor tenants, strategic partners and investors  
Begin work on interference cancellation techniques  
Analyze interference susceptibility of Inmarsat terminals
- [2004]** Finalize specifications and financing, secure anchor tenants

# Application and Petition for Reconsideration

## **Gating factors**

- Satellite service is operational; new satellites to be ordered after FCC action
- All user equipment will be enabled for full satellite service
- Proposed use of in-orbit spare satellites (unopposed) improves redundancy and reliability

## **Requests for additional flexibility**

- Necessary to provide service in smaller cities and reduce deployment expense
  - Ability to serve smaller cities is critical to existing and future customers
- No harmful interference to Inmarsat or its customers



# Application and Petition for Reconsideration (cont.)

- Half of the waiver requests to which Inmarsat objects relate to a single issue: the susceptibility of Inmarsat terminals to MSV base station transmissions in urban areas
  - Since the Order, MSV has done substantial testing of Inmarsat terminals demonstrating they are more robust than Inmarsat claims
  - MSV's proposed threshold is consistent with existing standards
  - NTIA's conclusions support MSV's proposal
- MSV's proposal to use  $6\% \Delta T/T$  as an interference threshold is consistent with the ATC Order
  - Since the Order, MSV has developed and demonstrated the application of interference cancellation techniques that remove intra-system interference as a limiting factor for ATC deployment
  - Inmarsat would be subject to less interference than it is today if the FCC uses  $6\% \Delta T/T$  as the appropriate inter-system interference threshold

# Application and Petition for Reconsideration (cont.)

- Other requests are not waivers
  - Variations that are consistent with the baseline
    - > Deployment of 80% of ATC facilities in the United States
    - > Use of terminals with lower gain antennas
    - > Lifting of restrictions on non-co-channel operation
  - Technical corrections
    - > Interference reduction attributable to half-rate vocoder