

Int'l Bureau

AUG 06 2004

Front Office

August 2, 2004

Via Hand Delivery

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

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Federal Communications Commission
Office of Secretary

Re: Mobile Satellite Ventures Subsidiary LLC
File No. SAT-MOD-20031118-00333
File No. SAT-AMD-20031118-00332
File No. SES-MOD-20031118-01879

Dear Ms. Dortch:

On November 18, 2003, Mobile Satellite Ventures Subsidiary LLC ("MSV") filed the above-captioned application for authority to operate an Ancillary Terrestrial Component in conjunction with the current and next-generation satellites of MSV and Mobile Satellite Ventures (Canada) Inc. MSV understands that consideration of the full extent of this application necessitates broad review by the Commission staff. MSV wishes to narrow the breadth of certain core elements of its application in order to shorten the time to process its license application. MSV urges the Commission to consider without prejudice in a subsequent phase its Petition for Reconsideration of the *ATC Order* as well as the full extent of its pending application. The core elements of the pending application are set out in the Attachment hereto.

An expeditious grant of this request will facilitate the early deployment of MSV's new facilities and services. The subsequent grant of MSV's more comprehensive request is essential to the full development of MSV's facilities and services.

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Please direct any questions regarding this matter to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lon C. Levin". The signature is fluid and cursive, with a large initial "L" and "C".

Lon C. Levin
Vice President

cc: Alan Auckenthaler, Inmarsat
John Janka, Counsel for Inmarsat

Attachment

Uplink

- 6 % $\Delta T/T$ for intersystem interference
- removal of limit on intra-system interference, subject to later showing of efficacy of interference cancellation techniques
- recognition that the use of a half-rate vocoder reduces potential interference by 3.5 dB
- recognition that results of antenna gain measurements of the ATC mobile terminal will be a factor in determining uplink flexibility, based on actual measurements that can be submitted later when prototypes are available
- elimination of 90,000 MT peak traffic limit

Downlink

- 8 dB (rather than the 15 dB specified in the application) more EIRP per base station sector and in the aggregate over a 50 mile radius, including towards the horizon, without any limit on the number of carriers per sector
- corresponding 8 dB increase in PFD limits at waterways & airports
- reduction by 10 dB in base station antenna limit on overhead gain suppression
- clarification that limit on base stations near airports is either a proximity limit or a PFD limit and not both

Other issues

- Approval for CDMA and clarification that other waveforms such as WiMAX can be deployed to the extent their parameters for uplink and downlink interference are within those approved for GSM and CDMA
- Approval of an in-orbit spare
- Approval of MSV's plans to use a booster for its early service, as consistent with requirement for integrated handsets