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November 7, 2005

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

Received

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Policy Branch
International Bureau

**Re: Application of Mobile Satellite Ventures Subsidiary LLC for
Modification of License to Operate an Ancillary Terrestrial Component
File No. SAT-MOD-20051104-00212
File No. SAT-MOD-20051104-00211
File No. SES-MOD-20051104-02556**

Dear Ms. Dortch:

On November 4, 2005, Mobile Satellite Ventures Subsidiary LLC ("MSV") filed the above-referenced applications for authority to modify its license to operate an ancillary terrestrial component ("ATC") in the L band.¹ MSV redacted Table 1 on page 5 of the Application which identifies the L band frequencies licensed to MSV and Mobile Satellite Ventures (Canada) Inc. ("MSV Canada") that are not shared by another L band operator within the visible portion of the geostationary arc as seen from the ATC coverage area. *See* Application, Narrative at 5. As discussed herein, this information should be treated as confidential.²

47 C.F.R. § 0.459(b)(1) – Identification of the specific information for which confidential treatment is sought

MSV requests confidential treatment of Table 1 on page 5 of its Application for authority to modify its license to operate ATC in the L band which identifies the L band frequencies licensed to MSV and MSV Canada that are not shared by another L band operator within the visible portion of the geostationary arc as seen from the ATC coverage area. *See* Application, Narrative at 5.

¹ See Application of Mobile Satellite Ventures Subsidiary LLC, File Nos. SAT-MOD-20051104-00212, SAT-MOD-20051104-00211, SES-MOD-20051104-02556 (November 4, 2005) ("Application").

² 47 C.F.R. § 0.459(b).

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- 47 C.F.R. § 0.459(b)(2) -- Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission**

This Table is being filed with MSV's application for authority to modify its license to operate ATC in the L band.

- 47 C.F.R. § 0.459(b)(3) -- Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged**

The Table for which confidential treatment is sought contains frequency assignments negotiated under the *Mexico City Memorandum of Understanding* and the on-going international L band frequency coordination process which is confidential to the parties to that coordination, which includes the Commission and MSV.³ The Commission has previously acknowledged the confidentiality of this information and has afforded it confidential treatment.⁴

- 47 C.F.R. § 0.459(b)(4) -- Explanation of the degree to which the information concerns a service that is subject to competition**

The Table for which confidential treatment is sought pertains to Mobile Satellite Service ("MSS") in the L band, which is part of the market for wireless services in which MSV faces competition from other MSS providers as well as from terrestrial wireless operators.

- 47 C.F.R. § 0.459(b)(5) -- Explanation of how disclosure of the information could result in substantial competitive harm**

Disclosure of the Table for which confidential treatment is sought would result in violation of the *Mexico City Memorandum of Understanding*.

³ See *Memorandum of Understanding for the Intersystem Coordination of Certain Geostationary Mobile Satellite Systems Operating in the Bands 1525-1544/1545-1559 MHz and 1626.5-1646.5/1646.5-1660.5 MHz*, Mexico City, Mexico, 18 June 1996.

⁴ See *COMSAT Corporation et. al., Memorandum Opinion, Order and Authorization*, 16 FCC Rcd 21661, ¶¶ 111 (2001) ("*COMSAT Order*") ("The Mexico City Agreement and related coordination documents, such as minutes of coordination meetings, are considered confidential.").

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47 C.F.R. § 0.459(b)(6) -- Identification of any measures taken by the submitting party to prevent unauthorized disclosure

The Table for which confidential treatment is sought is not publicly available. Disclosure to third parties of the Table for which confidential treatment is sought, if any, has been strictly pursuant to non-disclosure agreements.

47 C.F.R. § 0.459(b)(7) -- Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties

The Table for which confidential treatment is sought is not publicly available. Disclosure to third parties of the Table for which confidential treatment is sought, if any, has been strictly pursuant to non-disclosure agreements.

47 C.F.R. § 0.459(b)(8) -- Justification of the period during which the submitting party asserts that material should not be available for public disclosure

The Table for which confidential treatment is sought should remain confidential indefinitely or until the parties to the *Mexico City Memorandum of Understanding* agree that it can be made publicly available.

47 C.F.R. § 0.459(b)(9) -- Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted

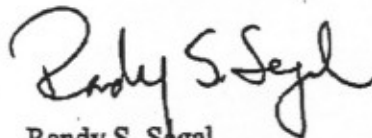
N/A.

Ms. Marlene H. Dortch
November 7, 2005
Page 4

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Please contact the undersigned with any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Randy S. Segal". The signature is written in black ink and is positioned above the printed name.

Randy S. Segal

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Table 1

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