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**CONFIDENTIAL –
NOT FOR PUBLIC INSPECTION**

January 26, 2006

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FOR PUBLIC INSPECTION**

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

**Re: Response of Mobile Satellites Ventures Subsidiary LLC to
Opposition of Inmarsat Ventures Ltd.
File No. SAT-MOD-20051104-00212
File No. SAT-MOD-20051104-00211
File No. SES-MOD-20051110-01561
File No. SES-MOD-20051104-02556**

Dear Ms. Dortch:

Mobile Satellites Ventures Subsidiary LLC (“MSV”) hereby files this non-redacted, confidential version of a Response to the Opposition of Inmarsat Ventures Ltd. (“Inmarsat”) to MSV’s application to modify its license to operate an Ancillary Terrestrial Component (“ATC”) in the L band.¹ As discussed herein, certain information provided in the attached Petition should be treated as confidential.² A redacted copy of this filing has been filed under separate cover for public inspection and has been served on the applicant.

¹ See MSV, Application, File Nos. SAT-MOD-20051104-00212, SAT-MOD-20051104-00211, SES-MOD-20051110-01561 (November 4, 2005) (“*MSV ATC Modification Application*”).

² 47 C.F.R. § 0.459(b). Pursuant to procedures adopted by the Commission on October 17, 2001, the attached non-redacted, confidential information is not filed in a sealed envelope. See “FCC Announces Changes in Filings Procedures,” *Public Notice*, DA 01-2430 (Oct. 17, 2001). MSV understands that, as stated in the *Public Notice*, Commission staff will place the attached information in an envelope marked “Confidential” upon receipt.

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

MSV requests confidential treatment of information relating to 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 When considering other applications to use Inmarsat satellites in the United States, the Commission has acknowledged the confidentiality of this information and has afforded it confidential treatment.⁴

- 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 information is being filed in MSV's Response to Inmarsat's Opposition to MSV's application to modify its license to operate an Ancillary Terrestrial Component ("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**

As the Commission has acknowledged, the *Mexico City Memorandum of Understanding* and related coordination documents are confidential.⁵

- 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 information contained herein concerns the market for wireless services, in which MSV faces competition from other MSS providers as well as from terrestrial wireless operators.

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.").

⁵ *Id.*

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

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

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

Disclosure to third parties of the information for which confidential treatment is sought 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 information for which confidential treatment is sought is not publicly available. Disclosure to third parties of the information for which confidential treatment is sought 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 information 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**

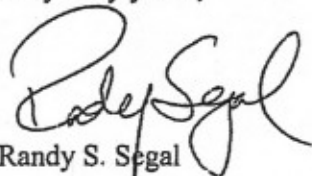
N/A.

Ms. Marlene H. Dortch
January 26, 2006
Page 4

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Please contact the undersigned with any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Randy S. Segal". The signature is written in a cursive style with a large initial "R" and "S".

Randy S. Segal