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### Via Hand Delivery

December 22, 2005

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

Re: Applications of MSV for Modified ATC Authority, SAT-MOD-20051104-00212;  
SAT-MOD-20051104-00211; SES-MOD-20051110-01561


Dear Ms. Dortch:

On December 14, 2005, Inmarsat filed the enclosed request to consolidate the pleading cycle of these three applications and thereby reduce the volume of filings, conserve Commission resources, and increase efficient application processing. Currently, virtually identical responsive pleadings would be due on January 6, 2006, and again on January 13, 2006.

MSV has indicated no objection to Inmarsat filing a single, consolidated responsive pleading on January 13, 2006, but MSV would prefer that these proceedings not be consolidated. Inmarsat understands that it may be more expedient to address its request to file a consolidated response instead as a request for an extension of the January 6, 2006 pleading deadline in SAT-MOD-20051104-00212, and SAT-MOD-20051104-00211. Thus, Inmarsat modifies its request and hereby seeks a seven-day extension, to January 13, 2006, of the deadline otherwise established by 25.154(a)(2) in those two proceedings.

The bases for a seven-day extension are set forth in the enclosed document. Moreover, the essential element of the applications, the list of subject frequencies, was filed under seal and was not made available to Inmarsat until November 28, 2005, almost two weeks after Inmarsat sought access from MSV.

Respectfully submitted,

  
John P. Janka

cc (by hand):

Roderick K. Porter  
Andrea Kelly  
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Cassandra Thomas  
Scott Kotler  
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# LATHAM & WATKINS LLP

**Via Hand Delivery**

December 14, 2005

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

Re: Applications of Mobile Satellite Ventures Subsidiary LLC for Modified ATC Authority, SAT-MOD-20051104-00212; SAT-MOD-20051104-00211; SES-MOD-20051110-01561

Dear Ms. Dortch:

Inmarsat Ventures Limited intends to participate in these proceedings, and is writing to request that the Commission consolidate the pleading cycle for these three applications to avoid the need to make redundant filings, to conserve Commission resources, and to provide administrative efficiencies. As it stands, there will be two different pleading deadlines on applications raising the same issues.

These three applications seek modified authority to provide ATC over (i) MSV's current generation spacecraft, (ii) MSV's next-generation spacecraft, and (iii) the Canadian-licensed TMI spacecraft whose capacity MSV markets. MSV itself acknowledges the interrelated nature of these applications, as MSV itself has sought consolidated treatment of all three applications. See Item 43 on MSV's Form 312 applications. Indeed, the technical aspects of these ATC applications appear virtually identical.

Public Notice of the two applications that involve MSV's own spacecraft, SAT-MOD-20051104-00212 and SAT-MOD-20051104-00211, occurred last Wednesday (See SAT-00333), setting a pleading deadline of January 6, 2006. The Commission has not yet placed on public notice the third application ----MSV's request for modified earth station authority to provide ATC over the Canadian-licensed TMI spacecraft, File No. SES-MOD-20051110-01561. Thus, the pleading deadline for the third application will be no sooner than January 13, 2006.

In order to provide the full thirty (30) days specified in the Section 25.154 of the Commission's rules for commenting on MSV's third ATC application, to avoid the need for redundant filings, to conserve Commission resources, and to provide administrative efficiencies, Inmarsat respectfully requests that the Commission establish a single deadline for commenting

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on all three of these ATC applications, with the initial pleading deadline calculated from the forthcoming public notice accepting for filing File No. SES-MOD-20051110-01561.

This consolidation request is consistent with Commission rules and precedent. Section 1.227 of the Commission's rules provides for consolidation where "such action will best conduce to the proper dispatch of business and to the ends of justice" in cases that involve the same applicant or substantially the same issues. That is the case here. *See also Nextel License Holdings 4, Inc. and Nextel WIP License Corp.*, 17 FCC Rcd 7028 (2002) (consolidating processing of similar petitions to deny and thereby aligning opposition due dates). Consolidating the upcoming pleading cycle also would be consistent with MSV's request for consolidated processing of these applications, while still affording the full thirty-day period specified in the Commission's Rules for filing comments on each ATC application. Moreover, as OET has recognized in a related context, the filing of a single submission by Inmarsat would facilitate full, efficient, and timely consideration of the issues. *See DA 05-3177 (rel. Dec. 12, 2005)* (encouraging joint submissions of pleadings related to a spectrum dispute between MSV and Inmarsat regarding the L-Band).

In sum, Inmarsat submits that grant of this consolidation request will reduce the volume of filings and increase the efficient processing of these applications, while providing only a very brief delay of filings otherwise due on January 6, 2006.

Respectfully submitted,

  
John P. Janka

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