

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Iridium Constellation LLC)	Call Sign S2110
)	
Application for Renewal of NGSO Space)	IB File No. SAT-_____
Station License)	
)	
)	
)	
)	
)	
)	
)	
)	

APPLICATION FOR RENEWAL OF SPACE STATION LICENSE

Pursuant to Sections 308 and 309 of the Communications Act, 47 U.S.C. §§ 308, 309, and Section 25.121(e) of the Commission’s Rules, 47 C.F.R. § 25.121(e), Iridium Constellation LLC (“Iridium”) seeks to renew its space station license for its Non-Geostationary Mobile Satellite Service (“NGSO MSS”) constellation, Call Sign S2110, for an additional fifteen-year license term. During the additional license period, Iridium will continue to operate existing in-orbit satellites until decommissioning at end-of-life,¹ will replenish its existing constellation with in-orbit spares and will launch and operate new next generation satellites. Once the technical design of Iridium’s next generation satellites has been finalized, Iridium will request modification of its space station authorization to accommodate the new design.

¹ Iridium has a pending application seeking approval for a modified end-of-life disposal plan. *Application of Iridium Constellation LLC For Minor Modification of Mobile Satellite Service Authorization to Update Orbital Debris Mitigation Requirements*, File No. SAT-MOD-20080701-00140 (filed Jul. 1, 2008).

As demonstrated herein, renewal of Iridium's space station license will serve the public interest by supporting Iridium's continued investments in its global MSS system and providing continuity of service for critical public safety and national security communications that cannot be matched by terrestrial services in addition to a range of maritime, aviation, machine-to-machine and land/mobile communications services to a growing customer base. Moreover, grant of this application is supported by mobile satellite renewal precedent. Iridium's renewal application has been submitted as an attachment to FCC Form 312.²

I. DESCRIPTION OF THE AUTHORITY REQUESTED

On January 1, 1995, the FCC authorized Iridium's predecessor in interest to launch and operate a NGSO satellite constellation in the Big LEO band.³ The license term commenced on November 1, 1998 when the Iridium constellation was put into operation.⁴ The current license term will expire on November 1, 2013.⁵ This application

² Because there is no electronic form for an NGSO space station renewal application, Iridium submits this application as a space station modification application on FCC Form 312, pursuant to Section 25.117 of the Commission's Rules, 47 C.F.R. § 25.117. Filing a modification application to renew the license term of an NGSO authorization is consistent with precedent. *Orbcomm License Corp., Application for Renewal of NVNG MSS Space Station License*, IBFS File No. SAT-MOD-2007-0302-00041 (filed Mar. 2, 2007); *Applications by Orbcomm License Corp. for Authority to Modify its Non-Voice, Non-Geostationary Satellite System*, Order and Authorization, File No. SAT-MOD-20070531-00076, 23 FCC Rcd 4804, ¶1 (Int'l Bur. 2008).

³ See *Application of Motorola Satellite Communications, Inc. for Authority to Construct, Launch and Operate a Low Earth Orbit Satellite System in the 1616-1626.5 MHz Band*, File No. SAT-L/A-19941115-00068 (granted Jan. 31, 1995); *Application of Iridium Constellation LLC For Minor Modification of Mobile Satellite Service Authorization to Update Orbital Debris Mitigation Requirements*, File No. SAT-MOD-20080701-00140 (filed Jul. 1, 2008).

⁴ *The World's First Global Satellite Telephone and Paging Company Starts Service Today*, News Release, Iridium LLC, Nov. 1, 1998.

seeks to renew the license term from November 1, 2013 for an additional standard fifteen-year term ending on November 1, 2028. Under Section 25.121(e) of the Commission’s Rules, a renewal application for a NGSO satellite system such as Iridium’s must be filed “no earlier than 90 days, and no later than 30 days, prior to the end of the twelfth year of the existing license term.”⁶ As such, this renewal is timely filed before October 2, 2010—30 days prior to the end of twelfth year of Iridium’s space station license term.

II. RENEWAL OF IRIDIUM’S SPACE STATION AUTHORIZATION WILL SERVE THE PUBLIC INTEREST.

Renewal of Iridium’s space station license will serve the public interest by supporting Iridium’s vital MSS system and its growing customer base. Iridium is the only MSS provider with full global satellite coverage—achieved through its constellation of sixty-six low-Earth orbiting (“LEO”), cross-linked satellites operating as a fully meshed network and supported by multiple in-orbit spares. Iridium’s satellites provide a range of services throughout the world and particularly in regions that are not reached by terrestrial services

Iridium’s robust MSS system has played a critical role during national emergencies, such as Hurricanes Katrina and Rita, as well as international emergencies, such as this past year’s earthquakes in Haiti and Chile. Indeed, a recent independent study recommended that “heavy users of satellite phones, and first responders who rely on satellite phones for emergency communications, select the Iridium phone and service”

⁵ See In the Matter of Amendment of the Commission’s Space Station Licensing Rules and Policies, FCC 02-45 (Feb. 14, 2002) (extending satellite license terms to 15 years); see also 47 C.F.R. § 25.121(a) (“licenses. . . will be issued for a period of 15 years”).

⁶ 47 C.F.R. § 25.121(e).

and found that “Iridium is a proven and reliable service that works well in all locations . . .”⁷

In addition to emergency services, Iridium also provides vital services to the Department of Defense and many federal U.S. bureaus, agencies and departments, including serving the critical and secure needs of U.S. and Coalition Forces throughout the Middle East region. And Iridium is a leading provider of maritime, aviation, machine-to-machine and land/mobile communications and the only provider of critical flight, maritime and worker safety applications in the polar regions.

Grant of this application will also benefit the public by allowing Iridium to continue to provide its critical services to a growing customer base. Indeed, Iridium already serves over 383,000 subscribers worldwide.⁸ And, just this past year, Iridium’s subscribers have grown by approximately 16.8 percent across its product and service areas.⁹

Moreover, Iridium’s continued operation of its NGSO constellation for the requested extended license term poses no risk of harmful interference. Iridium will continue to operate its first generation satellites in accordance with the technical parameters on file with and previously approved by the Commission. Accordingly, the technical information previously provided for Iridium’s existing satellite constellation

⁷ Press Release, Frost & Sullivan, *Iridium Proves its Value*, (Sep. 21, 2010), available at <http://www.frost.com/prod/servlet/press-release.pag?docid=211842212>.

⁸ Press Release, Iridium Communications Inc. *Iridium Reports Strong Growth in the Second Quarter and Raises All Elements of Guidance for 2010* (Aug. 9, 2010), available at <http://investor.iridium.com/releasedetail.cfm?ReleaseID=497768>.

⁹ See Iridium Communications, Inc., Form 10-Q at 20 (Aug. 9, 2010).

remains unchanged and is incorporated by reference.¹⁰ Simply put, no changes—interference, service or otherwise—arise from continuing the existing system operations.¹¹

Finally, Iridium is preparing to replenish and enhance its existing satellite constellation with a next generation system. On June 2, 2010, Iridium entered into an agreement with Thales Alenia Space (“Thales”) for the design and construction of satellites for the Iridium NEXT constellation.¹² Together, Iridium and Thales are in the process of finalizing the technical details of this fully-funded next generation system.¹³ In particular, the Iridium NEXT design will include “backward compatibility” to ensure continuity of service to existing customers. Once the technical design of Iridium’s next generation satellites has been finalized, Iridium will request modification of its space station authorization to accommodate the new design.

¹⁰ *Application of Motorola Satellite Communications, Inc. for Authority to Construct, Launch and Operate a Low Earth Orbit Satellite System in the 1616-1626.5 MHz Band*, File No. SAT-L/A-19941115-00068 (granted Jan. 31, 1995); *Application of Iridium Constellation LLC For Minor Modification of Mobile Satellite Service Authorization to Update Orbital Debris Mitigation Requirements*, File No. SAT-MOD-20080701-00140 (filed Jul. 1, 2008).

¹¹ Iridium is not providing Form Schedule S because this application does not request any technical changes to the Iridium satellites or constellation. Consequently, submission of a Schedule S with the instant application would be duplicative of the previously provided technical information. For this reason, and to the extent necessary, Iridium requests a waiver of any requirement to provide Schedule S.

¹² Press Release, *Iridium Announces Comprehensive Plan For Next-Generation Constellation* (June 2, 2010), available at <http://investor.iridium.com/releasedetail.cfm?ReleaseID=475071>.

¹³ Press Release, *Iridium Receives Commitments for \$1.8 Billion Credit Facility for Construction of Iridium NEXT* (Aug. 4, 2010), available at <http://investor.iridium.com/releasedetail.cfm?ReleaseID=496529>.

III. RENEWAL OF IRIDIUM'S SPACE STATION LICENSE IS ALSO SUPPORTED BY COMMISSION POLICY AND PRECEDENT.

Renewal of Iridium's space system license is supported by Commission policy and precedent. In similar circumstances, the Commission previously granted a fifteen-year license renewal to Orbcomm, which operates an NGSO MSS constellation, "to permit continued operations of both its on-orbit and yet-to-be-launched satellites."¹⁴ Orbcomm's circumstances are indistinguishable from Iridium's, and the Orbcomm precedent furnishes additional support for grant of Iridium's application.

Moreover, the Commission has recognized it is in the public interest for Big LEO licensees to be in a position to replace their satellites: "We assure Big LEO licensees that given the enormous investment necessary to construct and operate a satellite system, we will consider replacement applications in this service similar to other satellite services, that is, we will grant authority to implement a next generation system unless extraordinary circumstances prevent us from doing so."¹⁵ The Commission has further stated that with regard to MSS applications, it will "generally grant system operators the authority to implement replacement systems/satellites if the orbit location and/or frequencies remain available for use by U.S. systems."¹⁶ While this FCC policy focuses

¹⁴ *Applications by Orbcomm License Corp. for Authority to Modify its Non-Voice, Non-Geostationary Satellite System*, Order and Authorization, File No. SAT-MOD-20070531-00076, 23 FCC Rcd 4804, ¶1 (Int'l Bur. 2008).

¹⁵ *Amendment of the Commission's Rules to Establish Rules and Policies Pertaining to a Mobile Satellite Service in the 1610-1626.5/2483.5-2500 MHz Frequency Bands*, Report and Order, 9 FCC Rcd 5936, ¶ 187 (1994); *see also The Establishment of Policies and Service Rules for the Mobile Satellite Service in the 2 GHz Band*, Report and Order, 15 FCC Rcd 16127, ¶ 105 (2000); *see also Mobile Satellite Ventures Subsidiary LLC Application for Authority to Launch and Operate an L-Band Mobile-Satellite Service Satellite at 101° W.L.*, Order and Authorization, 20 FCC Rcd 9752, 9757, ¶ 13 (2005).

¹⁶ *The Establishment of Policies and Service Rules for the Mobile Satellite Service in the 2 Ghz Band*, Report and Order, 15 FCC Rcd 16127, ¶ 105 (2000); *see also Amendment of the Commission's Rules to Establish Rules and Policies Pertaining to a*

on replacement satellites, the underlying rationale for the policy also is applicable in the context of renewing an existing authorization for continued operation of an in-orbit constellation.

IV. CONCLUSION

For the foregoing reasons, Iridium hereby respectfully requests that the Commission renew Iridium's space station authorization, Call Sign S2110, for an additional fifteen-year license term.

Respectfully submitted,

/s/ Donna Bethea Murphy
Donna Bethea Murphy
Vice President, Regulatory Engineering
Iridium Satellite LLC
1750 Tysons Boulevard
Suite 1400
McLean, VA 22102

Dated: October 1, 2010

Non-Voice, Non-Geostationary Mobile-Satellite Service, Report and Order, 8 FCC Rcd 8450, ¶ 17 (1993) (noting that licensees will “generally be given replacement system authority if the frequencies remain available for use by comparable types of systems. . . . This policy will provide [Non-Voice Non-Geostationary] operators with assurance that we generally intend to grant replacement system authority . . .”).

Exhibit A
FCC Form 312, Response to Question 34: Foreign Ownership

The Commission has approved foreign ownership of the Iridium Licensees in excess of twenty-five percent and has provided the Iridium Licensees flexibility to acquire additional foreign ownership subject to certain conditions. *See Applications of Space Station System Licensee, Inc., Assignor, and Iridium Constellation LLC, Assignee, for Consent to Assignment of License Pursuant to Section 310(d) of the Communications Act*, Memorandum Opinion, Order and Authorization, DA 02-307, 17 FCC Rcd 2271 (Int'l Bur. 2002) (“2002 Iridium Order”); *Iridium Holdings LLC and Iridium Carrier Holdings LLC, Transferors, and GHL Acquisition Corp., Transferee, Applications for Consent to Transfer Control of Iridium Carrier Services LLC, Iridium Satellite LLC, and Iridium Constellation LLC, Memorandum Opinion and Order*, IB Docket No. 08-232, DA 09-1809 (rel. Aug. 14, 2009) (“Iridium-GHL Order”). Since the *Iridium-GHL Order*, any changes to the foreign ownership of the Iridium Licensees have been consistent with Iridium Communications Inc.’s status as a publicly traded company and the *2002 Iridium Order* and *Iridium-GHL Order*. In making this assessment with respect to the foreign ownership of the public shareholders, Iridium is relying on the detailed analyses conducted by the Altman Group in connection with the *Iridium-GHL Order*.¹⁷ In addition, it should be noted that the former members of Iridium Holdings LLC were subject to a lockup agreement that restricted their ability to sell shares for at least one year after closing. This lockup agreement expired on September 29, 2010.

¹⁷ *See Iridium-GHL Order* ¶¶ 41-43 (analyses of foreign ownership attributable to participation of GHQ IPO shareholders and Greenhill).

Exhibit B
FCC Form 312, Response to Question 40:
Officers and Directors of Iridium Constellation LLC

The name, principal business, address, citizenship, and ownership interest of each individual or entity that will directly or indirectly control a ten percent or greater interest in the Iridium Constellation LLC is as follows:

Name:	Iridium Holdings LLC
Principal Business:	Holding Company
Address:	1750 Tysons Boulevard Suite 1400 McLean, Virginia 22102
Citizenship:	U.S.
Voting Interest:	100%
Equity Interest:	100%

Name:	Syncom-Iridium Holdings Corporation
Principal Business:	Holding Company
Address:	1750 Tysons Boulevard Suite 1400 McLean, Virginia 22102
Citizenship:	U.S.
Voting Interest:	13.70%
Equity Interest:	13.70%

Name:	Baralonco, N.V.
Principal Business:	Holding Company
Address:	Kaya W.F.G. (Jombi) Mensing 36 Curacao, Netherlands Antilles
Citizenship:	Netherlands Antilles
Voting Interest:	36.20%
Equity Interest:	36.20%

Name:	Iridium Communications Inc.
Principal Business:	Holding Company
Address:	1750 Tysons Boulevard Suite 1400 McLean, Virginia 22102
Citizenship:	U.S.
Voting Interest:	100%
Equity Interest:	100%

Name: Baralonco Limited
Principal Business: Holding Company
Address: Craigmuir Chambers
P.O. Box. 71
Road Town, Tortola, British Virgin
Islands
Citizenship: British Virgin Islands
Voting Interest: 16.58%
Equity Interest: 16.58%

Name: Khalid bin Abdullah bin
Abdulrahman
Principal Business: Businessman and Investor
Address: Craigmuir Chambers
P.O. Box. 71
Road Town, Tortola, British Virgin
Islands
Citizenship: Saudi Arabia
Voting Interest: 16.58%
Equity Interest: 16.58%

Name: Greenhill & Co. Inc.
Principal Business: Independent Investment Bank
Address: 300 Park Avenue
New York, NY 10022
Citizenship: U.S.
Voting Interest: 17.40%
Equity Interest: 17.40%

Iridium Constellation LLC is a Delaware limited liability company. Iridium Satellite LLC has been designated as “Manager” of Iridium Constellation LLC. The following individuals have been designated as “officers” via special resolution of the Manager:

Matthew J. Desch, President and Chief Executive Officer
Thomas J. Fitzpatrick, Chief Financial Officer and Treasurer
John S. Brunette, Chief Legal and Administrative Officer and Secretary