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September 2, 2003

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Federal Communication Commission
Bureau / Office

Policy Branch
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VIA HAND DELIVERY

Thomas S. Tycz
Chief, Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-A665
Washington, DC 20554

Re: Modification of Licenses held by Iridium Constellation, LLC and Iridium, US LP For a Mobile Satellite System in the 1.6 GHz Frequency Band; File Nos. SAT-MSC-20030515-00089, SES-MSC-20030515-00666

Dear Mr. Tycz:

Iridium Constellation, LLC ("Iridium"), by its counsel, respectfully files this report updating the status of its continuing need for Special Temporary Authority ("STA") to provide global mobile satellite service ("MSS") in the 1620.10-1621.35 MHz frequency band ("Channel 9") in response to the Bureau's proposal in its Order to Show Cause released on July 17, 2003.¹ Demand for Iridium's services has remained relatively unchanged since the Commission's proposed grant of STA to Iridium on July 17, 2003. Iridium's continued access to Channel 9 spectrum on a temporary basis will allow it to provide critical support to U.S. Forces and Coalition Forces engaged in the Middle East region, thereby serving the public interest.

I. Order to Show Cause

On July 17, 2003, the International Bureau proposed to modify Iridium's license to authorize operation on Channel 9 for 120 days, up to November 14, 2003, "or until levels of usage and U.S. Government requirements no longer justify the need for additional spectrum, whichever occurs first."² The Bureau further proposed to require Iridium to file a report with the Commission on the first day of each month demonstrating its need for the continued use of Channel 9.

¹ *Modification of Licenses held by Iridium Constellation, LLC and Iridium, US LP*, Order to Show Cause, DA 03-2298, File Nos. SAT-MSC-20030515-00089, SES-MSC-20030515-00666 (rel. July 17, 2003) ("*Order to Show Cause*").

² *Id.* ¶ 1.

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Although the International Bureau has not acted on its proposals yet, Iridium files this report on the first business day of September 2003, as proposed in the *Order to Show Cause* and to keep the Commission apprised of its continued need for STA authority to use the 1620.10-1621.35 MHz frequency band.

II. Iridium's Continued Use of Channel 9 Will Serve the Public Interest

Iridium's continued use of Channel 9 will serve the public interest. As demonstrated in the attached graphical depiction of acquisition failures by the Iridium system, Iridium continues to experience extraordinarily high demand for service by U.S. and Coalition Forces in the Middle East region. Indeed, traffic levels on the Iridium system essentially have remained unchanged since Iridium's last request for STA on July 9, 2003³—still significantly higher than the usual levels experienced prior to April 11, 2003.

The FCC incrementally increased Iridium's spectrum usage based on need. That need has yet to subside. Iridium's uninterrupted access to Channel 9 remains necessary to ensure that the continued needs of U.S. and Coalition Forces in the Middle East region are met without substantial degradation in service.

Indeed, the Defense Information Systems Agency ("DISA") has indicated its support of Iridium's continued access to Channel 9. DISA has previously notified NTIA that there has been no drop in usage of the Iridium system by the Department of Defense in its support of operations in Iraq.⁴ It is Iridium's understanding that recently DISA filed a letter with the FCC supporting continuation of Iridium's STA for 120 days.

The attached graph demonstrates that the additional spectrum made available to Iridium since April 11, 2003 significantly reduced the frequency of "no channel available" call denials due to a lack of spectral resources. This realized public interest benefit could be seriously prejudiced absent Iridium's continued temporary access to the Channel 9 spectrum. Moreover, maintaining access to Channel 9

³ Letter from Peter D. Shields, Counsel, Iridium to Thomas S. Tycz, Chief, Satellite Division, FCC (July 9, 2003).

⁴ See Letter from Carl Wayne Smith, General Counsel, DISA to Mr. Frederick R. Wentland, Office of Spectrum Management, NTIA (July 10, 2003).

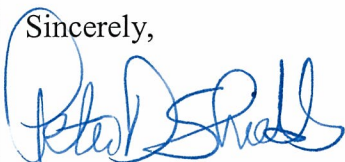
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could avoid service failures of the type experienced on April 11, 2003—prior to Iridium's temporary access to additional spectrum.

III. Conclusion

Iridium continues to require access to additional spectrum on a temporary basis. Thus, Iridium respectfully requests continued temporary authority to use the 1620.10-1621.35 MHz frequency band. Should you have any questions or require any additional information, please contact me at the number provided above.

Sincerely,

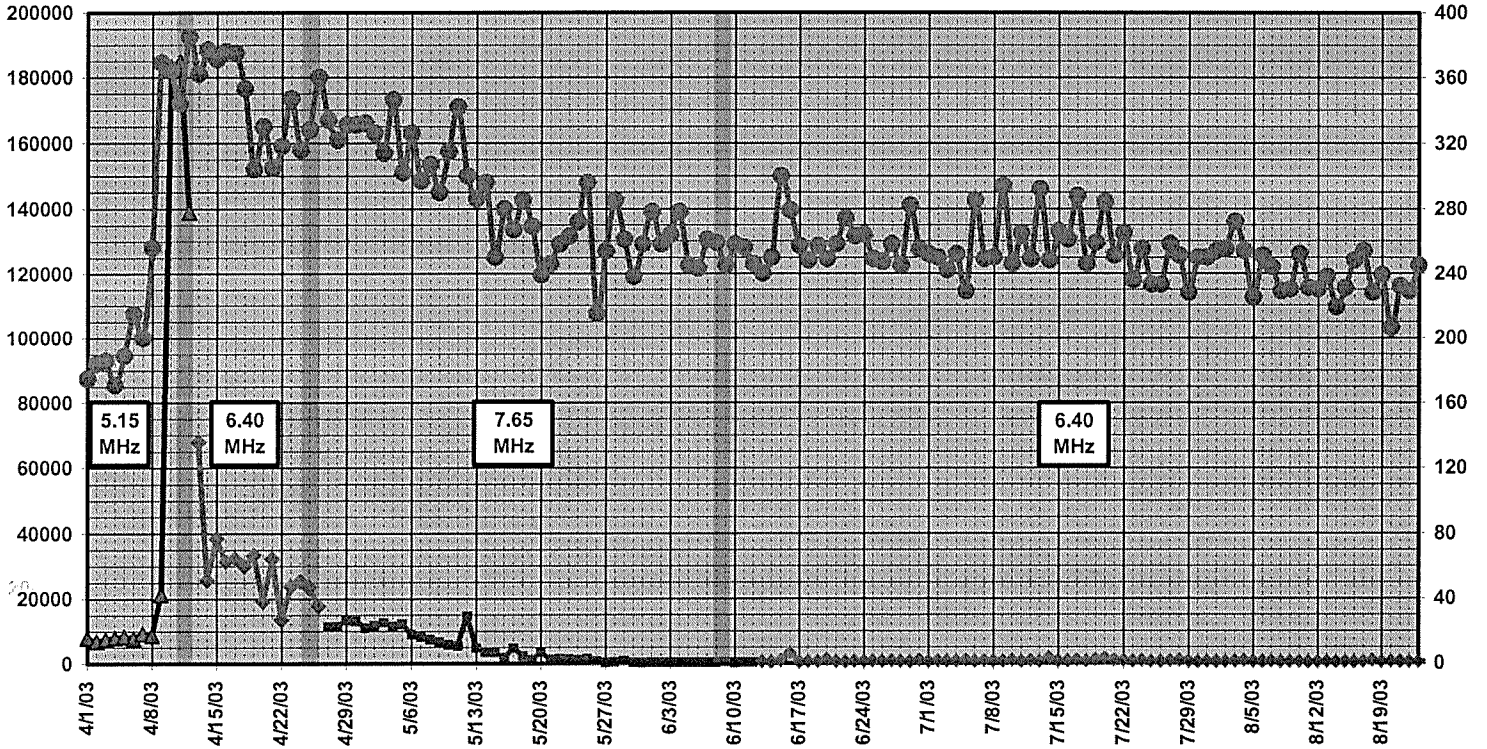


Peter D. Shields
Counsel to Iridium Constellation, LLC

cc: Attached Certificate of Service

System Acquisition Failures - No Channel Available: April 1 - Aug 23, 2003

- ▲ Acq. Fail 5.15 MHz
- ◆ Acq. Fail 6.4 MHz (4/12/03)
- Acq. Fail 7.65 MHz (4/26/03)
- ◇ Acq. Fail 6.4 MHz (6/12/03)
- Max SV Conns - PBH



CERTIFICATE OF SERVICE

I, Melissa Reed, certify that on September 2, 2003, the foregoing was served on all parties listed below by email, as indicated by an asterisk, or by U.S. mail, first class, postage prepaid.


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