

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Inmarsat Ventures Limited)
)

File No. SAT-MSC-20040210-00027

Received

APR 26 2004

Policy Branch
International Bureau

REPLY COMMENTS OF DEERE & COMPANY

Deere & Company ("Deere"), by its attorneys, hereby files comments in reply to the Comments of SES Americom, Inc. ("SES") and Opposition of Mobile Satellite Ventures Subsidiary LLC ("MSV"). Deere is an American company that holds a license ("License") to access non-core services of Inmarsat Ventures Ltd. ("Inmarsat") via receive-only VSAT earth stations operating in the L-band.¹ Deere fully supports the February 10, 2004 request ("Request") of Inmarsat for a determination that it has satisfied the independence and initial public offering ("IPO") requirements of the Open-Market Reorganization for the Betterment of International Telecommunications Act ("ORBIT Act").²

The Public Interest and Deere Dependence on Services Offered by Inmarsat

In previous submissions in support of the grant of its License, Deere has described its GreenStar® precision farming system, which combines the StarFire® receive-only earth station,

¹ File No. SES-LIC-20010112-00051 ("License"); *Comsat Corporation d/b/a Comsat Mobile Communications*, Memorandum Opinion, Order and Authorization, FCC 01-272, 16 FCC Rcd 21661, 24 CR 1019 (2001) ("*Access Order*").

² See Letter from Alan Auckenthaler, Inmarsat Ventures Limited, to Marlene H. Dortch, Federal Communications Commission (Feb. 10, 2004) ("Inmarsat Letter"). The Inmarsat Letter was placed on Public Notice on March 5, 2004 and assigned file number SAT-MSC-20040210-00027. See Public Notice, SAT-00197 (Mar. 5, 2004).

mobile processor, and display terminal hardware, mounted on farm equipment, with a suite of computer applications that have transformed agriculture for the twenty-first century. In brief, GreenStar®-equipped tractors offer automated GPS-based guidance systems and farm management tools. These tools allow a farmer to save fuel, accurately steer the vehicle, and vary the amount of seed, fertilizer, and herbicides used according to the specific location involved, as well as to plan the variance based on previously-collected data relating to yields, weather, irrigation, etc. Until Deere received the License, however, the highest SF2-level positioning accuracy, which relies on reception of the Inmarsat-distributed signal, was available only outside the United States; Deere's U.S. receive-only VSATs were not permitted to access the network feed, although, as a technical matter, the signal was available "in the ether" throughout the U.S., incidental to Deere's service to, for example, Canada, Mexico and South America.³

Once Deere's StarFire® receivers were authorized to receive Inmarsat signals in the U.S., the improved accuracy resulted in increased equipment capabilities and product demand. The SF2 differential correction signal delivered by Inmarsat improves the accuracy of the positioning system to a pass-to-pass accuracy for agricultural applications of approximately +/- 4 inches,⁴ which has allowed Deere both to upgrade and to expand its suite of agricultural software applications. Since 2003 Deere has provided the AutoTrac system, which allows self-steering of tractors, even at night.⁵ Even less-experienced operators can successfully operate farm vehicles

³ See *Access Order* at ¶ 64.

⁴ Deere feeds proprietary global positioning correction information to an Inmarsat satellite by landline, and the StarFire® receivers download the satellite signal (as well as signals from the GPS satellites) for use by the guidance system software application.

⁵ See *Access Order* at Appendix A.

equipped with AutoTrac, making jobs available to less skilled workers, and all operators experience less fatigue, resulting in more productivity and increased safety. A University of Illinois study ranked the Deere SF2 system first for accuracy,⁶ as did a recent study by a major German farm machinery journal.⁷ Deere dealers report that farmers are sold on the product after testing it for only 1000 yards.⁸ Demand for GreenStar® products has far exceeded even Deere's expectations, with more than 5000 units installed in only four years. Adding the huge U.S. domestic market to its potential customer base for SF2-network applications has also allowed Deere to make the increased technology research and development investment necessary for an expanded application suite and services. Not only has this resulted in major gains in efficiency and productivity for U.S. farmers, but also it has provided a base for expansion of Deere sales abroad, improving the U.S. position in the global marketplace.

In addition to the GreenStar® agronomic products, Deere's SF2 differential correction network is used in other types of applications. For example, the United States military has also found important uses for the precision positioning afforded by Deere's SF2 network. With respect to military applications, the License made possible domestic testing and training using SF2-network based equipment destined for deployment abroad. The off-shore drilling industry

⁶ See Press Release, *John Deere StarFire® GPS System Excels In University Of Illinois Study* (July 18, 2002).

⁷ See *GreenStar® Talk*, *GreenStar® PARALLEL TRACKING—THE ACCURATE CHOICE* (13 May 2002) (citing *Farm Journal February 2002* article reporting results of study of farm equipment by editors of German farm equipment journal *Profi*).

⁸ For more information on the GreenStar® system, see the brochure in Attachment A, or visit Deere's website at http://www.deere.com/en_US/ag/servicesupport/ams/ams-customertestimonial.html . Video which shows the system in operation is available at http://www.deere.com/en_US/ag/servicesupport/ams/feature-article-autotracc-assisted-steering-system.html .

uses precise positioning from the SF2 network for seismic mapping, as well as for precise positioning for supply vessels serving off-shore rigs. In areas such as the Gulf of Mexico, accurate positioning is an important safety requirement where large structures and vessels must maneuver in close proximity to each other in very deep and exposed locations. While Inmarsat-distributed services can be made available as “core” services for maritime users, the greatly expanded U.S. market for SF2 network-based products has led to substantial cost savings, and product availability to more users, as network costs can be spread among many more users and services.

Issuance of the License to Deere has resulted in important public interest benefits to U.S. agriculture and industry with respect to efficiency and productivity, as well as to U.S. industry’s global technology leadership, competitiveness, and access to world markets. Deere’s experience validates the Commission’s decision that grant of the License was in the public interest.⁹ Continued access to Inmarsat by Deere is therefore helpful to the recovery of the U.S. economy, including job recovery, particularly in the agricultural and agricultural equipment sectors.

Inmarsat Compliance with the IPO Requirements of the ORBIT Act

In their pleadings, SES and MSV each allege that Inmarsat’s issuance of debt securities does not comply with (1) the requirement for substantial dilution of aggregate ownership of the former Inmarsat signatories found in Section 621(2) of the ORBIT Act, (2) the requirement for an initial public offering of securities found in Section 621(5)(A) of the ORBIT Act, and (3) the requirement that shares be traded on one or more major stock exchanges with transparent and effective securities regulation as found in Section 621(5)(B) of the ORBIT Act. In making its allegations, MSV argues that Inmarsat must comply with a strict literal reading of each provision

⁹ *Access Order* at ¶ 108.

of the ORBIT Act. While SES acknowledges that the ORBIT Act sets as its standard for compliance that Inmarsat's privatization be "consistent with" the criteria set out in the ORBIT Act, SES then proceeds to argue as though a strict, literal compliance standard were in effect.

Standard of Interpretation. Contrary to the claims of MSV and the implicit arguments of SES, Section 601(b)(2) of the ORBIT Act does not call for privatization in a manner that strictly complies with a literal reading of each and every provision of the ORBIT Act. Rather Section 601(b)(2) requires that privatization of Inmarsat be "consistent with" the pro-competitive criteria set out in the ORBIT Act. The Commission addressed the meaning of the words "consistent with" in the *Access Order*, concluding that the language of the ORBIT Act calls for a standard that permits flexibility:

In the context of applying the ORBIT Act criteria, we construe the "consistent with" standard as inferring a degree of flexibility by requiring "congruity or compatibility." This flexibility allows us to avoid frustrating Congressional intent to enhance competition in the U.S. telecommunications market by an overly narrow interpretation. Also, applying this reasonably flexible standard will allow the Commission to act in accordance with Section 601(c) which requires the Commission to construe the licensing requirements of the Act in accordance with United States trade obligations under the General Agreement on Trade in Services (GATS). We therefore disagree with Motient and PanAmSat that the "consistent with" standard requires Inmarsat's strict compliance with each and every criteria specified in the Act.¹⁰

With this Commission precedent in mind, we can turn to a discussion of whether Inmarsat's initial public offering of debt securities satisfies the ORBIT Act's substantial dilution and initial public offering criteria for privatization in a manner that does not harm competition.

Compliance with Section 621(2). Section 621(2) of the ORBIT Act calls for Inmarsat to conduct an initial public offering for the purpose of achieving independence from the Inmarsat signatories. Specifically, the section requires that "[s]uch offering shall substantially dilute the

¹⁰ *Access Order* at para. 35 (footnotes omitted).

aggregate ownership of such entities by such signatories. . . .” SES and MSV both argue that Inmarsat’s initial public offering of debt securities does not satisfy Section 621(2) because (1) the offering of debt securities does not result in any dilution of ownership, and (2) the majority ownership of Inmarsat is now concentrated in two private equity groups, thereby defeating what they view as the intent of the ORBIT Act to achieve dilution through the issuance of equity securities to the general public.

However, as explained by Inmarsat in its Request and supported by Stratos Mobile Networks, Inc. (“Stratos”) in its comments, substantial dilution was achieved through a two step process of integrally-related transactions. Although the initial public offering of debt securities was subsequent in time to the acquisition of equity of funds advised by Apax Partners (“Apax”) and funds advised by Permira (“Permira”), the initial public offering of debt securities was an integral part of the acquisition of equity by Apax and Permira. Without the expectation of the initial public offering of debt securities, Apax and Permira would not have been able to obtain a bridge loan to fund in part their acquisition of Inmarsat equity. Therefore, the initial public offering of debt securities was inextricably intertwined with the dilution of ownership in Inmarsat held by the former signatories.

Moreover, as explained by Inmarsat in its Request, the signatories were diluted by 57 percent—a percentage of dilution that would be considered substantial by any measure.¹¹ SES and MSV argue that the dilution is insufficient because most of the new equity will be in the hands of two private equity firms. However, the purpose of Section 621(2) of the ORBIT Act is to eliminate one of the benefits Inmarsat previously enjoyed as an intergovernmental

¹¹ Cf. *New Skies Satellites, N.V.*, 16 FCC Rcd. 7482 (2001) (dilution of Intelsat signatories by 23% sufficient under the ORBIT Act).

organization and the perceived harm to competition caused by such benefit. In this case it was the perceived harm to competition resulting from a government controlled company competing with private companies. The 57 percent dilution eliminates government control.

SES and MSV would have the Commission interpret Section 621(2) in a manner that is more restrictive than expressed by Congress rather than flexibly as mandated by the “consistent with” standard as previously concluded by the Commission. There is no difference regarding the independence of Inmarsat from the former signatories and the effect on competition whether Inmarsat is controlled by two private equity funds or by dispersed shareholders. Either way Inmarsat is independent and the purpose of Section 621(2) has been achieved. Therefore Inmarsat’s initial public offering of debt securities is consistent with the independence criteria enunciated in Section 621(2) of the ORBIT Act.

Compliance with Section 621(5)(A). Section 621(5)(A) calls for an initial public offering of securities. Using the argument that an initial public offering is usually in the form of an initial public offering of equity securities, SES and MSV argue that the ORBIT Act requires that Inmarsat must have an initial public offering of equity, and not debt, securities. However, there is nothing in the language of Section 621(5)(A) to require that the securities cannot be debt securities. Rather, the language simply uses the word “securities” with no further restriction. Again, SES and MSV would have the Commission interpret the ORBIT Act in a manner more restrictive than the language written by Congress, rather than flexibly as mandated by the “consistent with” standard found in Section 601(b)(2) of the ORBIT Act.

Compliance with Section 621(5)(B). Section 621(5)(B) requires that shares of Inmarsat “be listed for trading on one or more major stock exchanges with transparent and effective securities regulation.” Contrary to the claims of SES, the language does not require the

exchange to be located in any particular country, the language does not mandate any particular exchange, and the language does not require any particular set of regulations other than that such regulation be “transparent and effective.” Inmarsat has listed the securities on the Luxemburg Stock Exchange, one of the most respected exchanges in Europe. In addition, Inmarsat will be listing the securities on the PORTAL® Market in the United States. As a result of these listings, and as detailed in Inmarsat’s Request, Inmarsat is subject to a host of reporting and other regulatory requirements, thereby achieving “transparent and effective securities regulation” as required by Section 621(5)(B).

SES and MSV further argue that Inmarsat has not complied with Section 621(5)(B) because Inmarsat has listed debt securities rather than equity securities for trading. They contend that the word “shares” is used to describe equity securities and could not possibly include debt securities. They thus maintain that the only way to comply with the section is to list equity securities for trading on a major exchange.

SES and MSV would have the Commission strictly interpret the language of the ORBIT Act as literally written. However, as discussed earlier, the “consistent with” standard found in Section 601(b)(2) of the ORBIT Act calls for flexibility in determining whether the competition test of the ORBIT Act has been met when examining Inmarsat’s privatization efforts. In the instant case, Inmarsat’s debt securities are being traded on the Luxemburg Stock Exchange and will be traded on the PORTAL® Market in the United States. As a result of such listings the debt securities are subject to “transparent and effective securities regulation.” Therefore, as explained by Inmarsat in its Request and Stratos in its comments, when interpreting the section flexibly pursuant to the “consistent with” standard, the Commission can reasonably find that the listing of debt securities is sufficient to comply with the criteria for an initial public offering.

Thus, the purpose of Section 621(5)(B) has been achieved in a manner consistent with the criteria set forth in the section.

Conclusion

As a result of Deere's ability to access non-core services of Inmarsat within the United States, Deere's customers have been able to deploy the GreenStar® precision farming system which utilizes the StarFire® receive-only earth station. The GreenStar® system has improved agricultural productivity of United States farmers, thereby helping the agricultural sector of the economy. As explained above, Inmarsat's issuance of debt securities as described in its February 10, 2004 Request is consistent with the criteria for an initial public offering as required by the ORBIT Act. Because the initial public offering is consistent with such criteria, and Deere's access to Inmarsat's non-core services are beneficial to agricultural production in the United

States, a finding by the Commission that Inmarsat's initial public offering is consistent with the privatization criteria of the ORBIT Act would serve the public interest.

Respectfully submitted,



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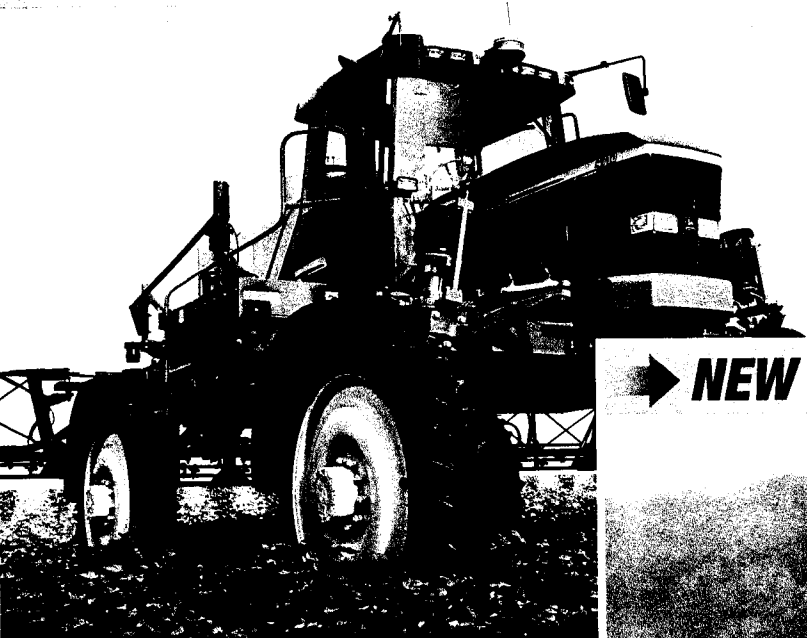
ATTACHMENT A

GreenStar™ Guidance Systems *Parallel Tracking • AutoTrac • RTK*

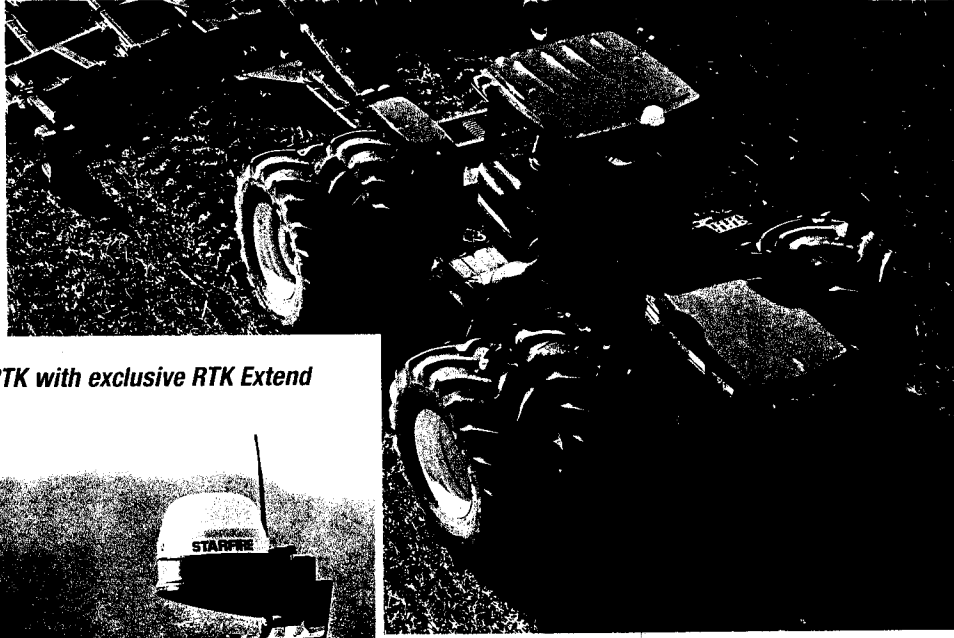


JOHN DEERE

➔ **NEW** AutoTrac for 4710 Sprayers



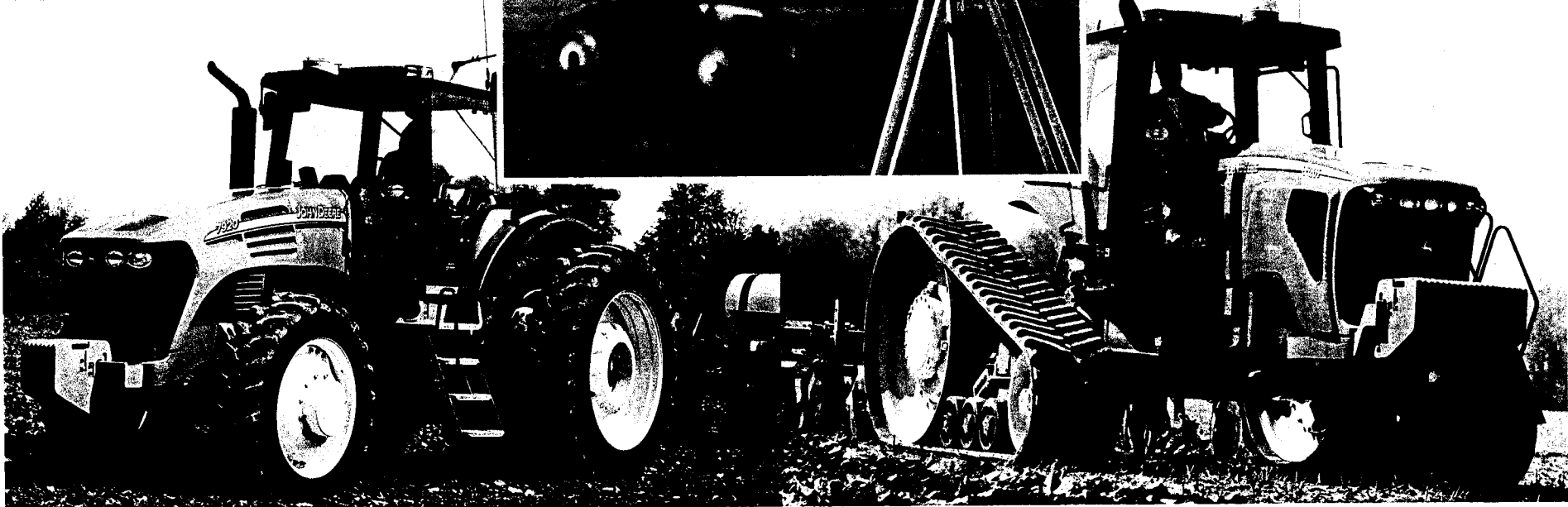
➔ **NEW** AutoTrac for 9020 Series Tractors



➔ **NEW** StarFire™ RTK with exclusive RTK Extend



➔ **NEW** AutoTrac for 7020 Series Tractors



Ag Management Solutions

Guidance Introduction

A John Deere GreenStar Guidance System not only helps you get the most out of your machinery investment, but more importantly, get the most out of the hours you spend in the field. Whether you go with Parallel Tracking or a GreenStar AutoTrac Assisted Steering system, you'll be improving the efficiency and productivity of your guidance-equipped vehicle, while saving time, fuel, labor and input costs.

A John Deere GreenStar Guidance system helps you:

Optimize Machine Efficiency

- Reduce implement or spray boom overlap
- Allows operator to more closely monitor implement or sprayer function

Reduce Operator Fatigue

- Easier operation, especially in narrow-row or drilled crops
- Easier operation in reduced-visibility situations
- More awareness of obstacles in the field

Increase Productivity

- More accurate placement of seed, herbicides, insecticides, and fertilizers
- Cover more acres with fewer machine and operator hours.

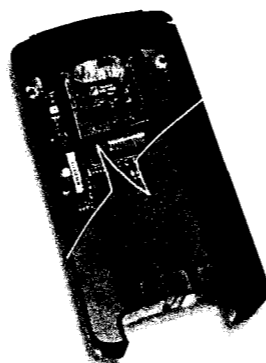
NEW – StarFire RTK

Designed to work with the proven StarFire receiver and AutoTrac, StarFire RTK (Real Time Kinematic) provides your operation with an accurate and repeatable guidance solution day after day, month after month, or year after year. See pages 6-7 for more information.

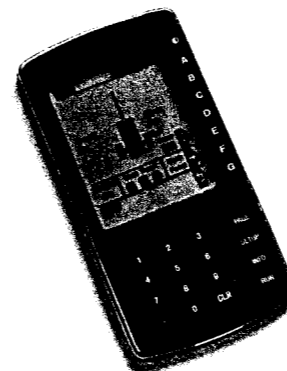
Three common components



The StarFire receiver is the most advanced receiver available. The dual-frequency DGPS receiver uses a 10-channel engine to pick up signals from Global Positioning System satellites, and is compatible with four differential correction signals – StarFire RTK, SF2, SF1 and WAAS. The GreenStar System uses these signals to pinpoint machine longitude, latitude, and altitude. Moving the receiver from one machine to another is simple.



The brains of a GreenStar system is the mobile processor. This mobile computer attaches quickly to the back of the GreenStar display. It logs field, crop, and position information to the PC Data Card when using mapping software. It also holds the KeyCard software for several applications, including Parallel Tracking, AutoTrac, and other applications. Best of all, the processor can be moved quickly from machine to machine.



The GreenStar display is simple to use. Menu-driven commands allow you to program information quickly. And the display lets you readily view operational data while on-the go. The same display works in all your equipment – tractor, combine, sprayer, and Gator utility vehicle.

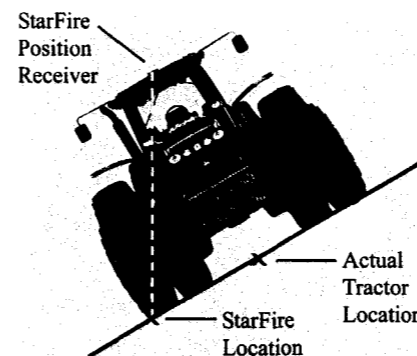
Pass-to

NEW TCM – Terrain Compensation Module



The TCM is designed to enhance the performance of GreenStar Guidance systems in conditions that cause vehicle roll.

On uneven or sloped ground, the vehicle will roll to one side, causing the StarFire receiver to shift in its position relative to the ground. The TCM accounts for this vehicle roll and provides the true position of the vehicle. TCM is attached to the StarFire receiver.



-pass accuracy, even on curved tracks

GreenStar Parallel Tracking benefits include:

- Improved efficiency – saves time, chemicals and fuel by reducing overlap.
- Lets you adjust for satellite drift, keeping chemical applications precise.
- Allows faster field speeds.
- Available on all colors and types of equipment with a 12-volt power source.
- Uses a vehicle icon and audible alerts to show location, not a complex lightbar.
- Works in straight or curved tracks and with four StarFire signal options – WAAS, SF1, SF2 and RTK.
- Makes counting rows an easy task in row-crop applications.



Parallel Tracking

Now you can apply fertilizer or chemicals without worrying about skips or overlaps, or straining to see foam markers ... even in low-visibility situations.

Or, hook up your widest tillage tool and drive down the field without wrenching your neck from constantly pivoting to check the tool's position.

It's all possible with GreenStar Parallel Tracking. **Even better, you can do all this in irregularly-shaped fields, because of Parallel Tracking's curved track capabilities.**

Parallel Tracking uses GPS signals to pinpoint your machine's location. Once you've designated the path you want to follow by establishing a baseline, visual indicators and audible alerts keep you parallel to this line at all times as you move across the field.

GreenStar Parallel Tracking also lets you save points in the field. So if you run out of spray solution, just mark the point, refill, and let Parallel Tracking guide you to the exact place you stopped spraying. Stored markers are saved in the memory indefinitely, so you can pick up where you left off hours or even days later.

If you already own the GreenStar common components and a GreenStar-ready tractor or sprayer, all you need is the Parallel Tracking KeyCard to guide your way to increased profits.



GreenStar AutoTrac Assisted Steering

Now, owners of John Deere wheeled tractors can find out what track owners have known for a couple of years: the GreenStar AutoTrac Assisted Steering System can help reduce operator fatigue during long hours in the cab and increase the accuracy of any straight-line operation. AutoTrac saves you time, fuel, and money, while making every pass more efficient.

AutoTrac uses the three common GreenStar components – the GreenStar display, mobile processor, and StarFire receiver – to steer your wheel or track vehicle during tillage, spraying, or seeding. All you have to do is steer through your first pass, mark it as Track 0, and let AutoTrac take over from there. The operator still makes headland turns and steers around obstacles, but with a push of a button, AutoTrac puts you back on track with the highest level of pass-to-pass GPS accuracy available. You and your operators will see the benefits immediately.

And now, AutoTrac assisted steering is available on select John Deere 4710 Self-Propelled sprayers. Now you can bring the productivity advantages of AutoTrac to these high-capacity sprayers, allowing operators to reduce boom overlap, and ease operation in drilled crops and low visibility situations. See your John Deere dealer for a complete model-by-model breakdown of AutoTrac compatibilities.

Wheels or tracks ... go hands free with

NEW Now get AutoTrac productivity on power-packed 9020 Series wheeled tractors. For operations with big horsepower requirements, the pulling power and fuel efficiency of the 9020 Series wheeled tractors along with the productivity advantages of AutoTrac make for a powerful combination during tillage, seedbed preparation and seeding operations.



John Deere 8000, 8010 and 8020 Series tractors. GreenStar AutoTrac is available on a wide range of these high productivity tractors, including 8000 and 8010 MFWD tractors, 8020 MFWD and ILS tractors, and all 8000T, 8010T and 8020T tractors.



GreenStar AutoTrac

➔ **NEW**

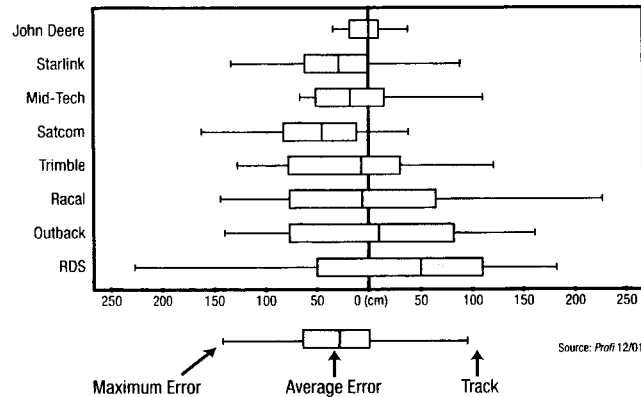


New for 2004 – 7020 Series tractors with GreenStar AutoTrac. An AutoTrac system allows owners to get even more productivity out of these new “around-the-clock” performers. Available from 140- to 170-PTO hp, the 7020 Series brings AutoTrac productivity advantages to a whole new horsepower range and farming operations.

➔ **NEW**



New for 2004 – 4710 Self-Propelled Strayers can be equipped with GreenStar AutoTrac. An AutoTrac-equipped sprayer provides your operation with even more product application productivity by reducing boom overlap, thus saving product, while also reducing operator fatigue and stress.



If you're looking for the most accurate GPS signal and receiver available, look to GreenStar. In independent testing conducted by Profi magazine, the GreenStar system generated at least a two-inch pass-to-pass accuracy 95% of the time.

Current AutoTrac Availability (availability as of 02/04)

- ➔ **NEW** 7720, 7820, 7920 MFWD or TLS Tractors
8000, 8010, 8020 MFWD or ILS Tractors Tractors
8000, 8010, 8020 Track Tractors
- ➔ **NEW** 9020 4WD Tractors (with PowerShift / Manual Shift Transmission)
- ➔ **NEW** 9000 4WD Tractors (with Manual Shift Transmission)
(PIN 40000 and above)
- ➔ **NEW** 9000 and 9020 Track Tractors
- ➔ **NEW** 4710 Sprayers

AutoTrac System Performance = GPS Signal + Implement Factors + Vehicle Factors + Field Conditions

It is important to understand that AutoTrac system accuracy encompasses a wide range of vehicle, implement, system and signal conditions. See your John Deere AMS-Ready dealer for more detailed information on getting the most out of your AutoTrac system.

AutoTrac Advantages

Return on investment, or ROI. Those are critical numbers for anyone running a business. And the goal for these figures is always the same: make them better so you can recoup your initial investment faster.

To get all of the productivity advantages your John Deere equipment offers, you have to look beyond the iron. Making the operator more effective and efficient when in the cab is a must. This is how AutoTrac can help you.

- **Reduce operator fatigue.** Feel better at the end of the day, after the long hours spent in the cab.
- **More efficient use of inputs.** Increase yields and reduce costs through more accurate placement of seed, fertilizer, and other crop inputs.
- **Higher operating speeds.** AutoTrac allows you to maintain superior pass-to-pass accuracy – even at higher speeds – so you get more done in a day.
- **Seed without marker arms.** AutoTrac eliminates the need for markers on air seeding equipment.
- **Reduced fuel use.** With less pass-to-pass overlap, you'll use less fuel.
- **Multiple applications.** Move the KeyCard to your non-AutoTrac-ready vehicle, and AutoTrac defaults to Parallel Tracking.

NEW StarFire RTK (Real Time Kinematic)

Designed to work with the proven StarFire receiver and GreenStar AutoTrac Assisted Steering system, StarFire RTK provides your operation with an accurate and repeatable guidance solution day after day, month after month, or even year after year.

Using a ground-based reference station, StarFire RTK provides high accuracy that's ideal for drip tape, strip-till, or any controlled traffic field operation.

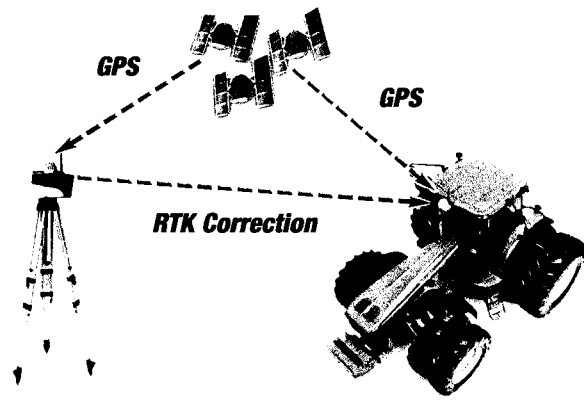
With the StarFire RTK base station providing a ground-based correction signal, GPS drift is essentially eliminated, thus your tractor can be guided down the same path time after time.

RTK Extend, exclusive to John Deere, allows StarFire RTK to sustain RTK accuracy for up to 15 minutes should the base station RTK signal be temporarily obstructed from the tractor-mounted receiver. This feature keeps you running, maximizing your up-time when a continuous line of sight to the base station is not available.

And best of all, StarFire RTK has been designed from the ground up to work with your existing John Deere GreenStar components – the StarFire receiver, mobile processor, GreenStar display, and AutoTrac system – extending your precision ag investment even further.

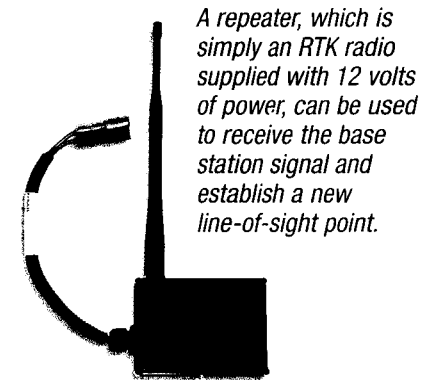
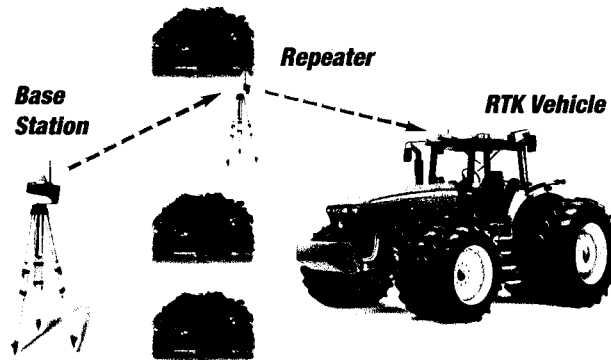
See your John Deere AMS-Ready dealer for more information about this newest addition to the John Deere AMS Guidance family of products.

Introducing StarFire RTK: Adding rep



The StarFire RTK system consists of a local base station in or near the field that transmits corrections to the StarFire receiver on the RTK-equipped vehicle. Corrections are transmitted from the base station to the vehicle via the RTK radio.

The base station monitors the government constellation of GPS satellites and continuously calculates a position, and since the base station is not moving, the errors can be calculated in real-time. This error is sent to the vehicle via the RTK radio where the vehicle's receiver uses this information to calculate a highly accurate, corrected position.



A repeater, which is simply an RTK radio supplied with 12 volts of power, can be used to receive the base station signal and establish a new line-of-sight point.

AutoTrac System Performance = GPS Signal + Implement Factors + Vehicle Factors + Field Conditions



It is important to understand that AutoTrac system accuracy encompasses a wide range of vehicle, implement, system, and signal conditions.

Implement Factors

- Integral or Drawn
- Draft Load
- Proper Setup

Field Conditions

- Soft or Hard Soils
- Soil Profile (rough or smooth)
- Compaction (moisture levels, etc.)

Vehicle Factors

- Vehicle Platform
- Proper Setup (ballast, tire, pressure, etc.)
- Steer Sensitivity

Signal Accuracy at StarFire Receiver

- RTK sub-inch*
- SF2 +/- 4 in.**

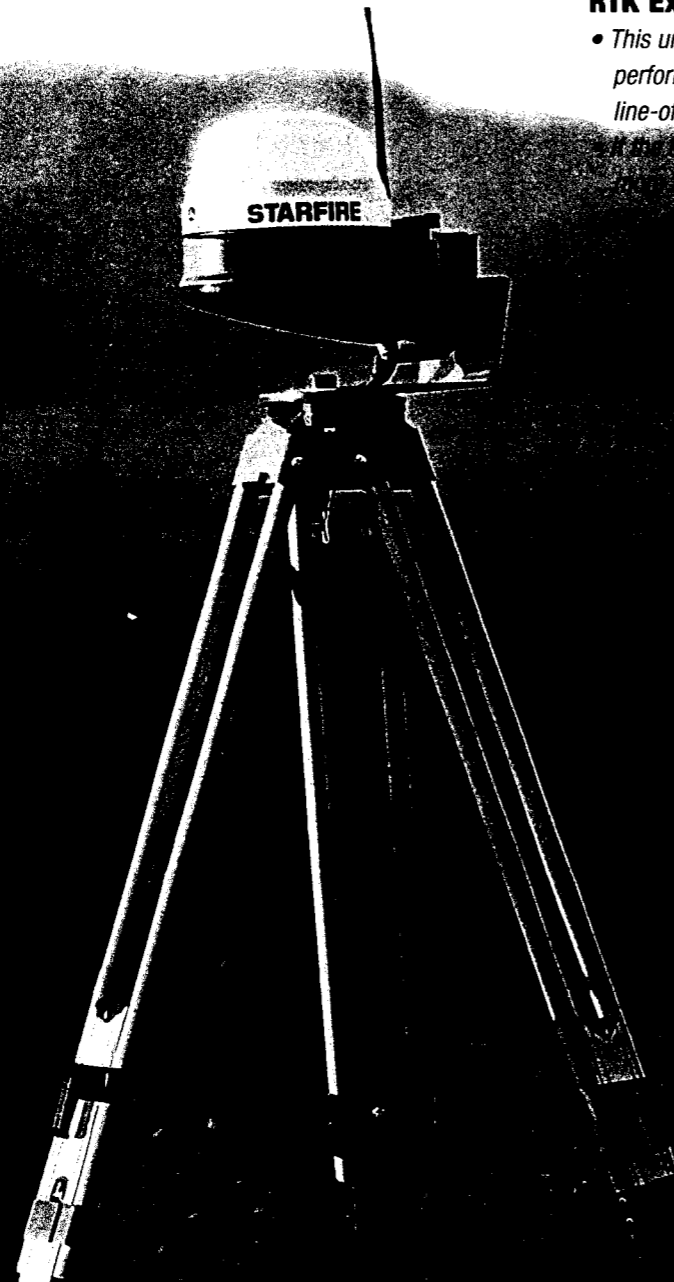
*Within 6 miles of base station and 68% of time **15 minute (pass-to-pass) Accuracy 95% of time

Repeatability to the GreenStar Guidance Family

RTK Extend → Industry Exclusive

RTK Extend Keeps You Moving

- This unique feature will maintain the performance of StarFire RTK when temporary line-of-sight obstructions occur.



StarFire RTK Advantages

The key advantage of the StarFire RTK system is repeatability. StarFire RTK eliminates nearly all of the GPS drift that occurs with satellite-based differential corrections systems, such as the StarFire Network (SF2 and SF1) and WAAS (Wide Area Augmentation System).

By eliminating GPS drift, the vehicle can be guided down the same tracks, day after day, month after month, or year after year. What's more, without GPS drift, the operator won't have to periodically use the Shift Track feature as they work the field.

StarFire RTK Accuracy

The StarFire RTK signal accuracy is dependent upon the distance of the StarFire RTK-equipped vehicle from the base station. If the vehicle is within 6 miles of the base station, signal accuracy is sub-inch 68% of the time. Remember, GPS signal accuracy is only part of the whole AutoTrac system accuracy equation.



The BEST support in precision ag ... period!

There's a long list of reasons to adopt a GreenStar Precision Ag System... but one of the best reasons is the long line of people you'll find standing behind every product.

A knowledgeable dealer, close to home.

Your John Deere dealer offers the only fully integrated precision ag system available. All components work together. And the entire system is backed by a single dealer who knows how important it is to keep your equipment running at peak condition.

Stellar web support.

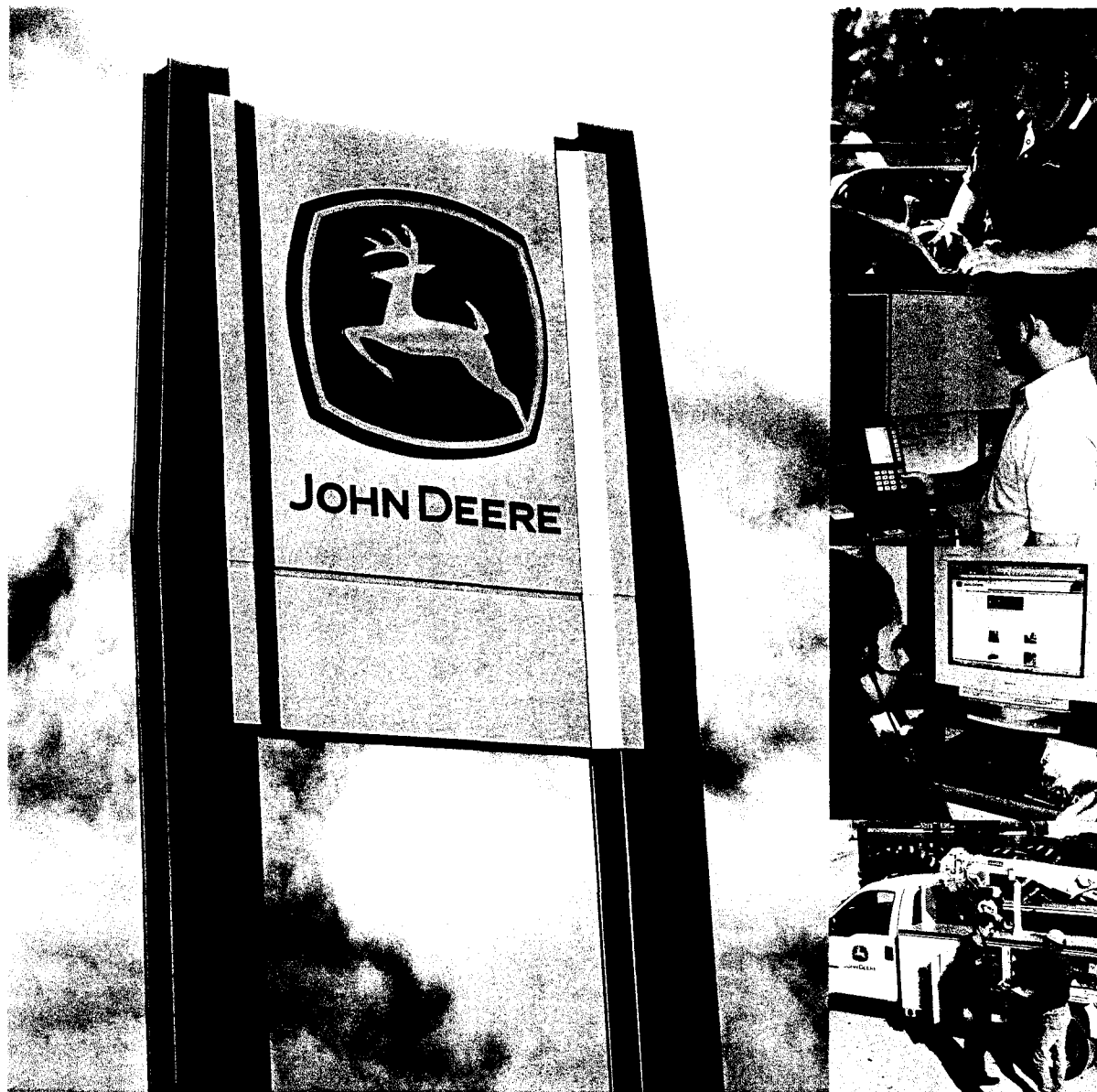
A dedicated customer-support web site, www.StellarSupport.com, gives you the tools you've been asking for... and more. Position receiver activation, online discussion, and product enhancements are all available at the click of your mouse.

24/7 phone support.

Trained John Deere professionals are only a phone call away, 24 hours a day, 7 days a week, to help troubleshoot any software or hardware problems and answer any questions you may have.

AMS Support Agreement

To help keep you up and running if either a hardware or software problem arises, an annual service agreement is available that provides unlimited phone support 24 hours a day. You can purchase the *AMS Support Agreement* at anytime through your John Deere dealer, at *1-888-GRN-STAR*, or at www.StellarSupport.com. If you prefer, support is also available on an as-needed basis, with a charge being assessed for each phone call made.



CERTIFICATE OF SERVICE

I, Valerie M. Steen, a secretary with the law firm of Swidler Berlin Shereff Friedman, LLP, hereby certify that on this 20th day of April 2004, served a true copy of the foregoing "Reply Comments of Deere and Company" by first class U.S. mail, postage prepaid, upon the following:

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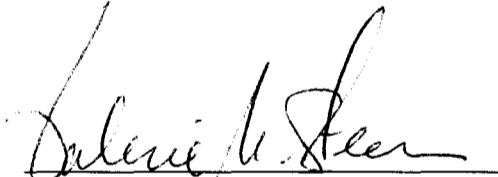
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*By Hand Delivery