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October 4, 2005

By Hand

Mr. Donald Abelson
Chief, International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20054

Re: Request to Designate Proceeding as "Permit But Disclose"
EXPEDITED PROCESSING REQUESTED

Inmarsat Global Limited
FCC File No. SAT-PPL-20050926-00184

Dear Mr. Abelson:

Inmarsat Global Limited ("Inmarsat") respectfully requests that the Commission designate as "permit but disclose" the *ex parte* status of this proceeding, which involves Inmarsat's Petition for Declaratory Ruling to serve the U.S. with a 2 GHz MSS spacecraft. The Commission has discretion to modify the application of its *ex parte* rules in any particular proceeding where, as here, the public interest warrants doing so. 47 C.F.R. § 1.1200(a).

This matter is inextricably intertwined with two pending proceedings where the Commission is considering licensing "returned" 2 GHz MSS spectrum to TMI/TerreStar and ICO, IB Docket Nos. 05-220 and 05-221. Both of those proceedings (i) involve proposals to modify the satellite authorizations of other entities, and (ii) have been designated "permit but disclose" for *ex parte* purposes.¹ Inmarsat's submissions in those two proceedings discuss its general plans for the 2 GHz satellite network with respect to which authority is sought here, and those intentions are more specifically delineated here.

Therefore, the free exchange of views made possible by "permit but disclose" status would allow for a more complete record,² and would apply the same *ex parte* rules to

¹ *Comments Concerning Use of Portions of Returned 2 GHz Mobile Satellite Service Frequencies*, FCC 05-133, 05-134 (rel. June 29, 2005).

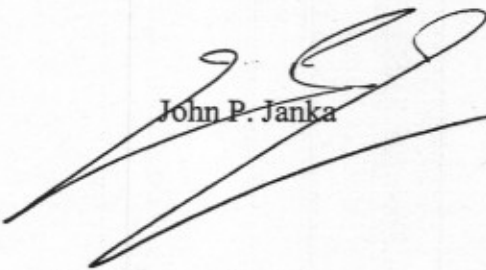
² See, e.g., *Public Notice*, Report No. SPB-136 (Aug. 25, 1998) (modifying *ex parte* status of contested TMI earth station application to "permit but disclose" to "assist the Commission in developing a complete record on which a well-reasoned decision can be made").

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Inmarsat's 2 GHz request as those that apply to the pending requests of TMI/TerreStar and ICO for additional 2 GHz spectrum. Conducting this matter on a permit-but-disclose basis also would be consistent with the *ex parte* treatment of other requests for satellite-related authorizations that were related to pending rulemaking proceedings.³

Inmarsat respectfully seeks expedited grant of this request to allow it to continue the dialogue with the Commission that Inmarsat was able to have prior to TMI/TerreStar's October 3, 2005 letter indicating its intention to participate in this proceeding.

Respectfully submitted,


John P. Janka

cc (by hand):

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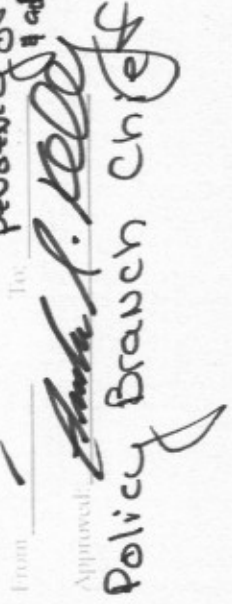
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Permit-But-Disclose

File # SAT-PPL-20050926-00184

Call Sign / Grant Date 10/5/05

Term Dates / To: pending of application & administrative process

Approved: 
Policy Branch Chief



³ See, e.g., Motion to Designate Proceedings as "Permit But Disclose," SAT-MOD-20031118-00333, SAT-AMD-20031118-00332 (filed Nov. 19, 2003, granted by grant stamp Dec. 2, 2003) (lifting "restricted" status of MSV satellite modification application in light of the related pending ATC rulemaking).

Attachment
File No. SAT-PPL-20050926-00184
October 5, 2005

On October 5, 2005, the Satellite Division, Policy Branch, granted Inmarsat Global Limited's (Inmarsat's) request to designate Inmarsat's Petition for Declaratory Ruling to serve the United States using a spacecraft that will operate in the 2 GHz band and the extended Ku band, File No. SAT-PPL-20050926-00184, as "permit-but-disclose" for purposes of the Commission's rules governing *ex parte* communications. See Letter from John P. Janka, Counsel for Inmarsat Global Limited, to Donald Abelson, Chief, International Bureau, Federal Communications Commission, dated Oct. 4, 2005. We find that designating the application as "permit-but-disclose" will facilitate resolution of the complex policy issues raised by the application. Thus, we designate IBFS File No. SAT-PPL-20050926-00184 as "permit-but-disclose," effective October 5, 2005. See 47 C.F.R. §§ 1.1200(a), 1.1206 and 1.1208, Note 2. This action is without prejudice to any determination regarding the processing of the application.

Permit-But-Disclose

File # SAT-PPL-20050926-00184



Call Sign _____ Grant Date 10/5/05
(or other identifier)

Term Dates
From _____ To: _____

Approved: [Signature]
Policy Branch Chief