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March 16, 2011

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VIA ELECTRONIC FILING

Hon. Julius Genachowski Chairman Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Iridium Satellite LLC Request for Special Temporary Authorization to Provide Mobile Satellite Service in the 1616-1617.775 MHz Band for an Additional 7 Days

Dear Chairman Genachowski:

Iridium Satellite LLC ("Iridium"), by its attorneys and pursuant to 47 C.F.R. § 25.120, hereby requests Special Temporary Authorization ("STA") to provide Mobile Satellite Service ("MSS") in the 1616-1617.775 MHz band for an additional 7 days—from March 19, 2011 through March 26, 2011.¹

Grant of this request will serve the public interest by continuing to facilitate the restoration of communications following the March 11, 2011 earthquake and tsunami in Japan. More specifically, grant will help accommodate the extremely high demand for voice and data communications services by emergency response personnel and non-government relief organizations.

As the FCC is aware, the recent earthquake, tsunami and after-shocks in Japan have caused extraordinary devastation, including massive damage to communications infrastructure in the region.² Indeed, new damage continues to emerge as at least one nuclear power plant has experienced a failure in the days following the

http://www.computerworld.com/s/article/9214203/_Massive_damage_from_Japan_quake_hits_com munications; see also Gavin Clarke, Megaquake Cuts Japan Phone Lines, The Register (Mar. 11, 2011) at http://www.theregister.co.uk/2011/03/11/japan_quake_phones_out/.

¹ On March 11, 2011, the Commission granted Iridium STA for testing and operation of its MSS system for a period ending March 18, 2011, in support of relief efforts in Japan. *See* IBFS File No. SAT-STA-20110311-00052.

² See Matt Hamblem, 'Massive Damage' from Japan Quake Hits Communications, Computerworld, (Mar. 11, 2011) at



Hon. Julius Genachowski March 16, 2011 Page 2

earthquake.³ As a result, in addition to the direct damage to telecommunications infrastructure, serious damage and devastation to power generation in Japan has resulted in reductions in capacity and rolling nationwide power outages, which have left wireline and wireless networks without reliable access to primary and backup power sources. Public safety officials, relief organizations, businesses and the public urgently need reliable voice and data communications services as they respond to the crisis. Iridium's mobile satellite service is ideally suited to meet this need and indeed, is currently providing vital service to emergency response teams and organizations in Japan. In fact, due to pre-positioning of Iridium equipment in Japan, many emergency vehicles are relying on Iridium as emergency response efforts continue.

Since the Commission's original grant of STA on March 11, 2011, Iridium's mobile satellite service has been essential to establishing communications both within Japan and between Japan and the rest of the world. Usage of the Iridium network spiked exponentially following the earthquake and continues at a very high level. Moreover, Iridium anticipates the already strong demand for its satellite service to grow as new aid groups and non-governmental organizations arrive in the area.⁴ Currently, approximately 3,700 telephony and data subscribers are active on the network in the area. This does not include U.S. military or allied troops who are also actively using Iridium's network as they move into the area to help with relief efforts. Additionally, as rescue and relief efforts continue, Iridium expects call

³ See International Atomic Energy Agency, IAEA, Update on Japan Earthquake, at http://www.iaea.org/newscenter/news/tsunamiupdate01.html. (reporting on explosions at the Fukushima Daiichi nuclear power plant and consequent population evacuations in the area); see also Keith Bradsher and Hiroko Tabuchi, Workers Strain to Retake Control After Blast and Fire at Japan Plant, NEW YORK TIMES (Mar. 15, 2011) at

http://www.nvtimes.com/2011/03/16/world/asia/16nuclear.html?hp.

⁴ One hundred and two countries and fourteen international organizations have already offered help to Japan, with a number of countries and organizations sending military personnel and rescue teams to assist first responders in Japan. See Reuters, Aid and Rescue Offers for Japan Ouake, at http://www.reuters.com/article/2011/03/15/us-japan-guake-aid-factboxidUSTRE72E6LM20110315; see also Mary Beth Sheridan and Craig Whitlock, U.S. Military, Aid Groups Prepare to Assist After Japan Quake, Washington Post (Mar. 11, 2011) at http://www.washingtonpost.com/wp-dyn/content/article/2011/03/11/AR2011031105825.html. A large number of non-governmental organizations have also sent rescue workers to Japan. See Cody Switzer, Responses from Charities to the Japan Earthquake and Pacific Tsunami, The Chronicle of Philanthropy, News, (Mar. 11, 2011) at http://philanthropy.com/article/Many-US-Charities-Waiting/126706/#.



Hon. Julius Genachowski March 16, 2011 Page 3

volumes to remain extraordinarily high for the region. Indeed, Iridium has recently shipped approximately 3,000 additional handsets to service providers, most of which will be delivered directly to Japan and could become active within the next twenty-four hours.

Continued temporary access to the additional 1.775 MHz of spectrum will enable the Iridium satellites to use the full 10.5 MHz for which they were designed and thus best ensure the availability of reliable communications in Japan. Without this additional spectrum, Iridium expects that its network quickly would reach maximum congestion, potentially causing the satellites to be overloaded and calls to be dropped.

Iridium has complied and will continue to comply with all conditions of the original grant of STA. In addition, Iridium has coordinated the filing of this STA extension request with Globalstar, and Globalstar has indicated that it has no objection to grant of this request.

Please direct any questions regarding this matter to Donna Bethea Murphy of Iridium or the undersigned.

Sincerely,

/s/ Jennifer D. Hindin

Jennifer D. Hindin Counsel to Iridium Satellite LLC

cc: L. Barbee Ponder IV (Globalstar, Inc.) Bob Nelson Karl Kensinger Cassandra Thomas Kathyrn Medley Stephen Duall