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March 23, 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 30 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 30 days—from March 26, 2011 through April 24, 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 continuing high demand for voice and data communications services by emergency response personnel and non-governmental 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 Japan continues to experience problems as workers attempt to stop radiation leaks following explosions at the large Fukushima Daiichi

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. On March 17, 2011, the FCC granted an extension of this STA for an additional period ending March 25, 2011. See IBFS File No. SAT-STA-20110316-00056.

² See Matt Hambley, ‘Massive Damage’ from Japan Quake Hits Communications, Computerworld, (Mar. 11, 2011) at http://www.computerworld.com/s/article/9214203/Massive_damage_from_Japan_earthquake_hits_communications; see also Gavin Clarke, Megaquake Cuts Japan Phone Lines, The Register (Mar. 11, 2011) at http://www.theregister.co.uk/2011/03/11/japan_earthquake_phones_out/.

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nuclear power plant.³ As such, 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 Iridium continues to experience an approximately 175 percent increase in minutes of use. 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 volumes to remain exceptionally high for the region. Indeed, on top of the thousands of handsets Iridium has recently shipped to the area, Iridium expects to ship

³ See Hiroko Tabuchi, David Jolly, and Kevin Drew, *Spent Fuel Hampers Efforts at Japanese Nuclear Power Plant*, NEW YORK TIMES, (Mar. 22, 2011) at <http://www.nytimes.com/2011/03/23/world/asia/23japan.html>.

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 Quake*, at <http://www.reuters.com/article/2011/03/15/us-japan-quake-aid-factbox-idUSTRE72E6LM20110315>; 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/#>.



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approximately 2,700 more by early next week. As these handsets become active on the network, additional strain will be placed on Iridium's capacity.

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.

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
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