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August 12, 2002

REQUEST FOR CONFIDENTIAL TREATMENT

By Hand Delivery

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Constellation Communications Holdings, Inc., Application for Transfer of
Control of Licenses, File Nos. SAT-T/C-20020718-00114

Mobile Communications Holdings, Inc. Application for Transfer of Control
of License, File No. SAT-T/C-20020719-00104

Dear Ms. Dortch:

In response to a request for additional information from the International Bureau regarding the above-captioned applications,¹ ICO Global Communications (Holdings) Limited ("ICO") submits the enclosed response ("Response") and accompanying certification.

The Response provides information concerning identifiable foreign ownership interests in ICO. This information consists of sensitive commercial and financial information, the disclosure of which would likely cause substantial competitive harm, and is therefore exempted from mandatory disclosure under Exemption 4 of the Freedom of Information Act ("FOIA Exemption 4")² and Section 0.457(d) of the Commission's rules.³ ICO, pursuant to Sections 0.457 and 0.459 of the Commission's rules,⁴ requests the Commission to withhold from public inspection and accord confidential treatment to the enclosed Response. In support of this request, and pursuant to Section 0.459(b) of the Commission's rules, ICO states the following:

¹ See Letter from Thomas S. Tycz, Chief, Satellite Division, International Bureau, FCC, to Cheryl A. Tritt, Counsel to ICO (Aug. 1, 2002).

² 5 U.S.C. § 552(b)(4). See *Public Citizen Research Group v. FDA*, 704 F.2d 1280, 1290-91 (D.C. Cir. 1983).

³ 47 C.F.R. § 0.457(d).

⁴ 47 C.F.R. §§ 0.457, 0.459.

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1. ICO seeks confidential treatment of the Response and, specifically, information contained in the Response regarding U.S. and foreign ownership interests in ICO not ordinarily required to be disclosed under the Commission's rules with respect to non-common carrier licenses. ICO does not seek confidential treatment of ownership information contained in the Response that was previously provided in the above-captioned applications pursuant to the Commission's rules.

2. As noted above, the Response is being submitted in response to a specific request from the International Bureau in connection with the above-captioned applications.

3. The Response contains information regarding non-controlling, minority ownership interests in ICO. Because ICO is a privately held company, information regarding the identity of its non-controlling, minority investors constitutes sensitive commercial and financial information that "would customarily be guarded from competitors"⁵ and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.

4. The Response contains information regarding the ownership of ICO, the proposed transferee of licenses to provide mobile satellite services ("MSS"), which are subject to competition from a number of other MSS providers.

5. Disclosure of information contained in the Response regarding ICO's non-controlling, minority investors would likely result in substantial competitive harm to ICO. Because this information is not publicly available, its disclosure would allow competitors to use this information to their competitive advantage. Additionally, public disclosure of information regarding ICO's non-controlling, minority investors could deter future investments in ICO. Furthermore, confidential treatment is necessary to protect the privacy interests of ICO's non-controlling, minority investors.

6. As a matter of policy, ICO does not disclose, and has not disclosed, information regarding minority investments in ICO, foreign or otherwise.

7. Information regarding non-controlling, minority ownership interests in ICO is not available to the public. There has been no intentional disclosure of this information to any third parties.

8. ICO requests confidential treatment of the Response for an indefinite period. Confidential treatment during this period is necessary to protect the privacy interests of the minority investors of ICO.

⁵ 47 C.F.R. § 0.457(d)(2).

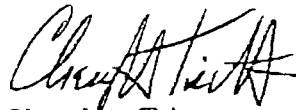
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In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the Response within the Commission on a "need to know" basis. In the event that any person or entity requests disclosure of the Response, ICO requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Very truly yours,



Cheryl A. Tritt
Counsel to ICO Global Communications (Holding) Limited

Enclosures

cc: Howard Griboff (by facsimile)