

Before the
Federal Communications Commission
Washington, D.C. 20554

ORIGINAL

In the matter of)	File Nos.
)	
Telenor Satellite, Inc.)	SES-LFS-20050930-01352 (Call Sign E050276)
Application for Title III Blanket)	SES-AMD-20051111-01564
License to Operate BGAN)	SES-AMD-20060109-00019
Terminals with Inmarsat 4F2 at)	SES-AMD-20060607-00942
52.75°W)	SES-AMD-20070112-00106
)	
FTMSC US, LLC)	SES-LFS-20051011-01396 (Call Sign E050284)
Application for Title III Blanket)	SES-AMD-20051118-01602
License to Operate BGAN)	SES-AMD-20060605-00926
Terminals with Inmarsat 4F2 at)	SES-AMD-20060804-01315
52.75°W)	

FILED/ACCEPTED

JUL 13 2007

Federal Communications Commission
Office of the Secretary

RECEIVED

JUL 17 2007

Satellite Division
International Bureau

REPLY

Mobile Satellite Ventures Subsidiary LLC (“MSV”) hereby files this Reply to the Responses submitted by VIZADA Services LLC (“VIZADA”),¹ Telenor Satellite, Inc. (“Telenor”), and Inmarsat Ventures Limited (“Inmarsat”) concerning the Supplement filed by MSV in the above-referenced proceedings.² In the Supplement, MSV requested that the Commission limit to no more than 5,000 terminals the combined total of Broadband Global Area Network (“BGAN”) terminals the two now-affiliated applicants are permitted to operate in the United States under Special Temporary Authority (“STA”). MSV cited uncontradicted evidence that 5,000 terminals is far more than the companies have customers for and expressed its concern

¹ VIZADA was formerly FTMSC US, LLC and changed its name on June 7, 2007. *See* VIZADA Services, LLC, Request for Special Temporary Authority, File No. SES-STA-20070619-00833, at Attachment 1.

² *See* VIZADA Services LLC and Telenor Satellite, Inc., Reply to Supplement (July 2, 2007); Inmarsat Ventures Limited, Response of Inmarsat Ventures Limited (July 3, 2007) (hereafter, collectively “Responses”).

that the excess capacity serves only to disincentivize Inmarsat from coordinating the satellite it uses to provide BGAN service. Nothing in the Responses rebuts MSV's conclusions.

No party disputes MSV's key point that the Commission authorized an excessive number of BGAN terminals and that drastically reducing the number of terminals authorized to the two affiliates would cause no harm to any entity. Instead, VIZADA and Telenor claim that MSV has provided no evidence of harmful interference from BGAN operations.³ MSV does not concede that BGAN operations have not caused harmful interference to MSV. In any event, however, the current operation of only a few BGAN terminals demonstrates nothing regarding the potential for interference if an increasing number are operated in the future. The fact that the STA operations are authorized on a non-interference basis does not moot this concern, as VIZADA and Telenor imply.⁴ Such a condition simply requires MSV and its customers to suffer interference before action is taken to mitigate the interference.

VIZADA, Telenor, and Inmarsat also question how the continued authorization of BGAN terminals distorts the coordination process.⁵ Inmarsat even boldly claims that it "has every incentive to coordinate with MSV."⁶ But that is far from the truth. Because each of Inmarsat's distributors has more capacity than it needs now or in the near future and the FCC continues to grant renewals of the STAs to provide BGAN service, Inmarsat is effectively providing BGAN service to the U.S. without any coordination agreement and has no practical need to coordinate its satellite any time soon. Accordingly, for the above reasons, MSV requests that the

³ See VIZADA Services LLC and Telenor Satellite, Inc., Reply to Supplement, at 2 (July 2, 2007).

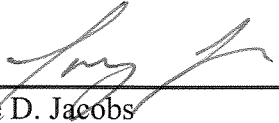
⁴ See *id.* at 2 n.1.

⁵ See *id.* at 2; Inmarsat Ventures Limited, Response of Inmarsat Ventures Limited, at 2 (July 3, 2007).


⁶ Inmarsat Ventures Limited, Response of Inmarsat Ventures Limited, at 2 (July 3, 2007).

Commission drastically reduce the aggregate number of BGAN terminals authorized to
VIZADA and Telenor.

Respectfully submitted,



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Dated: July 13, 2007

CERTIFICATE OF SERVICE

I, Sylvia Davis, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that on this 13th day of July 2007, I served a true copy of the foregoing by first-class United States mail, postage prepaid, upon the following:

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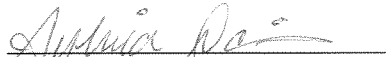
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