

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**FILED/ACCEPTED**

**APR 25 2008**

Federal Communications Commission  
Office of the Secretary

In the Matter of	)	
	)	
TerreStar Networks, Inc.	)	File Nos. SES-LIC- 20061206-02100
	)	SES-AMD-20070723-00978
	)	SES-AMD-20070907-01253

**COMMENTS OF NEW ICO SATELLITE SERVICES G.P.**

New ICO Satellite Services G.P. (“ICO”) submits these comments in support of the above-captioned application, as amended, for ancillary terrestrial component (“ATC”) authority (“Application”) and the associated waiver request (“Waiver Request”) filed by TerreStar Networks, Inc (“TerreStar”).<sup>1</sup> ICO believes that the public interest is best served by permitting the most flexible use of the 2 GHz band for MSS/ATC.<sup>2</sup> ICO agrees with TerreStar that many of the existing rules from which TerreStar seeks relief were designed to protect Boeing’s planned, but ultimately abandoned, Aeronautical Mobile Satellite (Route) Service, and that waiver is therefore warranted. Waiver of the rules would permit more efficient use of 2 GHz MSS spectrum and more effective

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<sup>1</sup> On March 26, 2008, the Commission issued a Public Notice, seeking comment on TerreStar’s Application and Waiver Request. FCC Public Notice, *Satellite Communications Services, Re: Satellite Radio Applications Accepted For Filing*, at 1-2. Report No. SES-01018 (Mar. 26. 2008).

<sup>2</sup> ICO holds a Letter of Intent Authorization to provide MSS in the 2 GHz band. ICO has recently notified the Commission that it has met one of its final milestones with the successful launch of its ICO G1 geosynchronous satellite on April 14<sup>th</sup> of this year. See Letter from Suzanne H. Malloy, Sr. Vice President, Regulatory Affairs, ICO, to Marlene H. Dortch, Secretary, FCC (Apr. 18, 2008). ICO’s ATC application and associated waiver requests are currently under consideration by the Commission.

deployment of 2 GHz MSS systems, thereby enabling the many benefits to consumers that MSS/ATC service will bring.

Respectfully submitted,

NEW ICO SATELLITE SERVICES G.P.

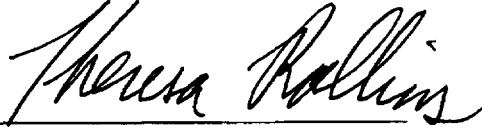
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**CERTIFICATE OF SERVICE**

I hereby certify on this 25<sup>th</sup> day of April 2008, a copy of the foregoing COMMENTS has been served via first class mail, postage pre-paid to the following:

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Goldberg, Godles, Wiener & Wright  
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*Counsel for TerreStar Networks, Inc.*

  
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Theresa Rollins