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November 12, 2009

FILED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Re: File Nos. SES-AMD-20070907-01253 and SES-AMD-20070723-00978

Dear Ms. Dortch:

In the above-referenced application, TerreStar Networks Inc. ("TerreStar") has sought ancillary terrestrial component ("ATC") authority in connection with the operation of its 2 GHz mobile satellite service system. TerreStar certified in the application, and hereby reaffirms, that it has or will satisfy all of the ATC "gating" criteria in Section 25.149 of the Commission's rules, including Section 25.149(b)(2), which specifies that GSO MSS ATC systems maintain a spare satellite on the ground within one year of commencing ATC operations. At the request of the staff of the International Bureau, TerreStar hereby supplements its application by providing the following information concerning the status of its spare satellite, which is known as TerreStar-2:

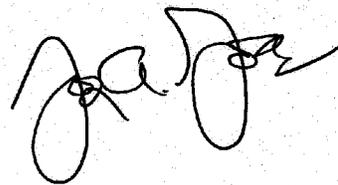
TerreStar has paid approximately 91% of the contract price for TerreStar-2, and Space Systems/Loral has completed approximately 85% of the construction of TerreStar-2. Once construction has been completed, the testing phase will begin. Delivery is scheduled for the 4th quarter of 2011, which is consistent with TerreStar's planned commencement of ATC operations in late 2010.

TerreStar is building TerreStar-2 for the purpose of meeting the Commission's gating criteria regarding ATC. Consequently, TerreStar manages the delivery date of TerreStar-2 to keep it synchronized with the business planning around ATC rollout. As delays in launch of TerreStar-1 and shifts in the commercial and technical markets in which TerreStar is building its networks have shifted the expected start date for ATC operations, TerreStar has managed the build of TerreStar-2 to ensure the optimal use of resources. This schedule management ensures that TerreStar-2 meets the intent of the Commission's ground spare rule efficiently. First, TerreStar-2, in effect, has already served as a spare for TerreStar-1. In order to ensure that TerreStar-1 was able to launch on July 1, 2009, certain parts from TerreStar-2 were used to replace TerreStar-1 parts that either failed during final testing or were damaged in connection with an accident at the reflector manufacturing facility.¹ Second, TerreStar intends to deploy an end-to-end fourth generation integrated satellite/cellular network. This means that the ATC portion of the integrated network will be based on long term evolution ("LTE") technology. Because commercial-grade LTE components likely will not be available until late 2010, TerreStar does not expect to commence commercial ATC operations until that time or later.

Consequently, TerreStar is pleased to inform the Commission that, consistent with its previous certification that it will have a ground spare ready within one year of commencing ATC operations, TerreStar-2 remains on track to satisfy the gating criterion for a ground spare. TerreStar will continue to coordinate TerreStar-2 and the commencement of ATC operations to ensure compliance with the Commission's rules.

Please direct questions concerning this matter to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joe Godles', written over a light gray dotted background.

Joseph A. Godles
Attorney for TerreStar Networks Inc.

cc: William Bell
Stephen Duall

¹ See FCC File Nos. SAT-MOD-20080718-00143, SAT-MOD-20080718-00143.