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Satellite Division Federal Communications Commission  
International Bureau Washington, D.C. 20554

FILED/ACCEPTED

JUN 18 2007

Federal Communications Commission  
Office of the Secretary

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	)	

**SUPPLEMENT**

Mobile Satellite Ventures Subsidiary LLC (“MSV”) hereby files this Supplement to its Petitions to Hold in Abeyance or to Grant with Conditions,<sup>1</sup> seeking to limit to no more than 5000 the combined total of Broadband Global Area Network (“BGAN”) terminals the two now-affiliated applicants are permitted to operate in the United States. All the evidence indicates that authority for 5000 terminals is far more than the two affiliates need. Grant of more only distorts a satellite coordination process that has been unresolved for too long.<sup>2</sup>

MSV initially filed its Petitions regarding the separate applications of Telenor Satellite, Inc. (“Telenor”) and FTMSC US, LLC (“FTMSC”) to protect its own satellite system and

<sup>1</sup> See Mobile Satellite Ventures Subsidiary LLC, Petition to Hold in Abeyance or to Grant with Conditions, File Nos. SES-LFS-20050930-01352 (Call Sign E050276) *et al.* (November 23, 2005); Mobile Satellite Ventures Subsidiary LLC, Petition to Hold in Abeyance or to Grant with Conditions, File Nos. SES-LFS-20051011-01396 (Call Sign E050284) *et al.* (November 23, 2005).

<sup>2</sup> With respect to the applications for long-term authority to operate BGAN terminals, MSV sees no need to limit the combined entity to any particular number of BGAN terminals, provided that the Commission grants these applications only after L band coordination discussions are finalized and a coordination agreement is reached that addresses MSV’s concerns.

customers from the potential interference caused by the operation of an uncoordinated Inmarsat Ventures Ltd. (“Inmarsat”) satellite providing service to Telenor and FTMSC customers. To date, the Inmarsat satellite remains uncoordinated and the Commission has limited the applicants to operation under Special Temporary Authority (“STA”). The FCC recently approved the transfer of control of Telenor Satellite Services AS (“TSS”) to Inceptum 1 AS (“Inceptum”), effectively permitting the combined entity through its subsidiary Telenor and affiliate FTMSC to operate a combined total of 10,000 BGAN terminals under STA.<sup>3</sup>

Neither Telenor nor FTMSC has been or can legitimately claim that it will be harmed if the Commission limits the combined entity to a total of 5,000 BGAN terminals for operations under STA. Inmarsat has revealed in a recent Securities and Exchange Commission filing that all of its sixteen BGAN distributors combined have activated only roughly 7,119 BGAN terminals worldwide, as of December 31, 2006.<sup>4</sup> Despite having an opportunity to do so in the transfer of control proceeding, Telenor and FTMSC, however, have not revealed to the Commission what fraction of that number the two distributors have activated for use in the United States,<sup>5</sup> presumably because neither Telenor nor FTMSC could justify the need for their

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<sup>3</sup> Telenor is owned and controlled by TSS, and the same entities that own Inceptum also own FTMSC. Telenor and FTMSC are each authorized to operate 5,000 BGAN terminals under STA. *See* Comments of Mobile Satellite Ventures Subsidiary LLC, IB Docket No. 06-225 (January 22, 2006); Reply of Mobile Satellite Ventures Subsidiary LLC, IB Docket No. 06-225 (February 6, 2007); *see also* Authorizations Granted, Telenor ASA, Transferor, and Inceptum 1 AS, Transferree, Seek FCC Consent to Transfer Control of Licenses and Authorizations and a Declaratory Ruling on Foreign Ownership, IB Docket No. 06-255, DA 07-2163, at 2-3 (May 23, 2007). MSV incorporates by reference in these proceedings the two pleadings cited above.

<sup>4</sup> *See* Inmarsat Group Limited, 2007 Form 20-F (April 30, 2007), at 30, 50, *available at* <http://www.sec.gov/Archives/edgar/data/1291396/000119312507094923/d20f.htm> (last visited June 14, 2007).


<sup>5</sup> *See* Reply of Mobile Satellite Ventures Subsidiary LLC, IB Docket No. 06-225, at 2 (February 6, 2007) (noting that neither Inceptum, TSS, nor Inmarsat disputed the evidence presented by


existing authority for 5,000 terminals, let alone the combined total of 10,000 terminals.

Accordingly, grant of MSV's request would cause no real harm to the combined entity.

The authorization for far more BGAN terminals than Inmarsat and its distributors will need for the next several years only serves to disincentivize Inmarsat from satisfying its obligation to coordinate its Inmarsat 4F2 satellite pursuant to the L band coordination process. In contrast, limiting the number of BGAN terminals authorized to Telenor and FTMSC serves the public interest by mitigating interference to MSV and its customers, resulting from the failure of Inmarsat to coordinate its satellite.<sup>6</sup> For the above reasons, the Commission should limit the aggregate number of BGAN terminals authorized to Telenor and FTMSC under STA to no more than 5000.

Respectfully submitted,

  
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MSV that the Commission authorized an excessive number of BGAN terminals under STA and that the parties could not justify their need for 5,000 terminals, much less 10,000 terminals).

<sup>6</sup> In granting the BGAN STAs, the International Bureau acknowledged the potential for interference resulting from operation of the uncoordinated BGAN service with the uncoordinated 4F2 satellite by adopting certain conditions. This interference potential increases with the authorization and operation of each additional BGAN terminal. *See* Telenor Satellite Inc., File No. SES-STA-20060313-00430 (Call Sign E050276) (granting with conditions an STA on May 12, 2006 to operate 5,000 BGAN terminals); FTMSC US LLC, File No. SES-STA-20060314-00438 (Call Sign E050284) (granting with conditions an STA on May 12, 2006 to operate 5,000 BGAN terminals).

## CERTIFICATE OF SERVICE

I, Renee Williams, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that on this 18<sup>th</sup> day of June 2007, I served a true copy of the foregoing by first-class United States mail, postage prepaid, upon the following:

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