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NOV 27 2006

Satellite Division  
International Bureau

ORIGINAL

Jennifer A. Manner  
Vice President,  
Regulatory Affairs

PHONE: 703 390-2730  
FAX: 703 390-2777  
EMAIL: [jmanner@msvlp.com](mailto:jmanner@msvlp.com)

November 22, 2006

**Via Hand Delivery**  
Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

FILED/ACCEPTED

NOV 22 2006

Federal Communications Commission  
Office of the Secretary

**Re: Pending Applications to Operate with an Uncoordinated Inmarsat Satellite  
File Numbers Attached as Exhibit A**

Dear Ms. Dortch:

To date, the International Bureau ("Bureau") has granted Special Temporary Authority ("STA") for the operation of 30,000 Broadband Global Area Network ("BGAN") terminals in the United States.<sup>1</sup> Mobile Satellite Ventures Subsidiary LLC ("MSV") has opposed the grant of applications to operate BGAN terminals due to the potential that their use on uncoordinated Inmarsat satellites will cause harmful interference to MSV's licensed operations.<sup>2</sup> Recently, it has come to light that Inmarsat has only 5,547 BGAN subscribers worldwide, the vast majority of which presumably operate outside the United States.<sup>3</sup> This new information helps to demonstrate that: (i) any absence of interference from BGAN operations to date demonstrates nothing regarding the potential interference that will result if more and more BGAN terminals are operated in the future; and (ii) Inmarsat and its distributors have greatly exaggerated the demand for the BGAN service.

Since grant of the BGAN STAs, Inmarsat and its distributors have contended that BGAN service has been provided in the United States without interference.<sup>4</sup> Inmarsat and its distributors, however, have never revealed how many of the 30,000 BGAN terminals authorized

<sup>1</sup> See, e.g., Stratos Communications, Inc., Request for Special Temporary Authority, File No. SES-STA-20060310-00419 (filed March 10, 2006; granted with conditions on May 12, 2006).

<sup>2</sup> See, e.g., Mobile Satellite Ventures Subsidiary LLC, Petition to Hold in Abeyance, File No. SES-LFS-20060303-00343, File No. SES-AMD-20060316-00448 (Call Sign E060076) (April 14, 2006).

<sup>3</sup> See Exhibit B, attaching excerpts from Inmarsat Group Limited's Form 6-K filed with the SEC on November 15, 2006, available at: <http://www.sec.gov/Archives/edgar/data/1291398/000119312506235898/0001193125-06-235898-index.htm>

<sup>4</sup> See Inmarsat Ventures Limited, Reply, File No. SES-STA-20061019-01868 (Call Sign E060179) (November 8, 2006), at 1, 2.

by the Bureau are actually in operation today. In fact, although Inmarsat's BGAN service was launched almost a year ago in December 2005,<sup>5</sup> Inmarsat in a November 15, 2006 filing submitted with the U.S. Securities and Exchange Commission ("SEC") reveals that there are only 5,547 BGAN subscribers worldwide today.<sup>6</sup> These terminals are used in 172 countries, with Inmarsat's Chinese distribution partner accounting for 12% of BGAN sales, mostly to Chinese media, oil, and gas companies.<sup>7</sup> While MSV is not aware of any publicly available figures on the number of BGAN terminals deployed in the United States (and Inmarsat has failed to provide any such figure in the record), it is safe to assume that only a fraction of the 5500 BGAN terminals activated worldwide today are used in the United States. Thus, despite Inmarsat's claims, the operation of a handful (if any) BGAN terminals to date demonstrates nothing regarding the potential for interference if more and more BGAN terminals are operated in the future. In fact, if these BGAN terminals have been provided to first responders, it is most likely that the terminals are being used only during an emergency. During these emergencies, interference is likely to those first responders that use MSV's service that are responding to the same emergency.

To alleviate this risk of interference, MSV has urged the Bureau to establish a firm expiration date for the BGAN STAs and provide that no further extensions will be granted without Inmarsat having first completed coordination of its new satellite with other North American L band operators.<sup>8</sup> If, however, the Bureau continues to renew the BGAN STAs without insisting that Inmarsat first complete coordination, there are no reasonable prospects that such coordination will ever be successfully completed. This is especially the case now that Inmarsat has revealed that only roughly 5500 BGAN terminals have been activated *worldwide* in the past year. At this rate, it will be many years before Inmarsat and its distributors approach the limit of 30,000 BGAN terminals authorized in the United States pursuant to STA. Only a firm expiration date for the BGAN STAs will provide Inmarsat with the needed incentive to satisfy its obligation to coordinate its satellite with other North American L band operators. Not only will successful coordination mitigate the harmful interference that would otherwise result from operation of Inmarsat's uncoordinated satellite, this coordination should also facilitate rebanding of L band spectrum into more contiguous frequency blocks that will increase efficient use of L band spectrum and maximize the potential for offering broadband services, which Chairman Martin recently explained is the Commission's top priority.<sup>9</sup>

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<sup>5</sup> See Inmarsat Announces Launch of BGAN Service (December 7, 2005), available at: <http://about.inmarsat.com/news/00018831.aspx?language=EN&textonly=False>

<sup>6</sup> See *supra* note 3.

<sup>7</sup> See Communications Daily (November 16, 2006), at 12 (quoting Inmarsat's Chief Operating Officer).

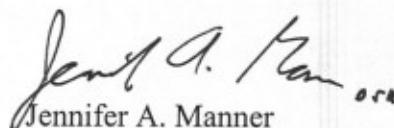
<sup>8</sup> See Mobile Satellite Ventures Subsidiary LLC, Comments, File No. SES-STA-20061019-01868 (Call Sign E060179) (October 24, 2006), at 4-5.

<sup>9</sup> See Remarks of FCC Chairman Kevin J. Martin, Imagining the Digital Healthcare Future in the Rural West, Montana State University – Bozeman (July 7, 2006).

In the event that the Bureau permits the BGAN STAs to continue without establishing a firm expiration date, the Bureau should at least require the STA holders to disclose the number of BGAN terminals that are actually in operation using the Inmarsat-4 satellite that is serving the United States. L band operators can use this information to assess the potential aggregate interference to their operations. Moreover, until coordination is completed, the Bureau should limit the BGAN terminals authorized under these STAs to those terminals that are issued to "first responders,"<sup>10</sup> based on sworn affidavits provided by the STA holders supporting their claims.

Please contact the undersigned with any questions.

Very truly yours,

  
Jennifer A. Manner

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<sup>10</sup> The Bureau should define a "first responder" as a unit of the Federal Government or any entity that would qualify to hold a license under Section 90.523 of the Commission's rules. *See* 47 C.F.R. § 90.523 (providing that State or local government entities and certain nongovernmental organizations that provide services, the sole or principal purpose of which is to protect the safety of life, health, or property, as well as satisfy other criteria, may qualify to hold certain licenses).

## Exhibit A

### Pending Applications to Provide BGAN Services with Inmarsat 4F2

Applicant	File Number
Stratos Communications Inc.	SES-LFS-20050826-01175 (Call Sign E050249) SES-AMD-20050922-01313 (Call Sign E050249) SES-AMD-20051117-01590 (Call Sign E050249)
Telenor Satellite, Inc.	SES-LFS-20050930-01352 (Call Sign E050276) SES-AMD-20051111-01564 (Call Sign E050276) SES-AMD-20060109-00019 (Call Sign E050276) SES-AMD-20060607-00942 (Call Sign E050276)
FTMSC US, LLC	SES-LFS-20051011-01396 (Call Sign E050284) SES-AMD-20051118-01602 (Call Sign E050284) SES-AMD-20060605-00926 (Call Sign E050284)
MVS USA, Inc.	SES-LFS-20051123-01634 (Call Sign E050348) SES-AMD-20060329-00540 (Call Sign E050348)
BT Americas Inc.	SES-LFS-20060303-00343 (Call Sign E060076) SES-AMD-20060316-00448 (Call Sign E060076)
Thrane and Thrane	SES-LFS-20060522-00852 (Call Sign E060179)

### Applications for STA to Provide BGAN Services with Inmarsat 4F2

Applicant	File Number
Stratos Communications Inc.	SES-STA-20061103-01946 (Call Sign E050249)
Telenor Satellite, Inc.	SES-STA-20061027-01898 (Call Sign E050276)
FTMSC US, LLC	SES-STA-20061006-01820 (Call Sign E050284)
MVS USA, Inc.	SES-STA-20061106-01955 (Call Sign E050348)
BT Americas Inc.	SES-STA-20061101-01933 (Call Sign E060076)
Thrane and Thrane	SES-STA-20061019-01868 (Call Sign E060179)

**Exhibit B**

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**SECURITIES AND EXCHANGE COMMISSION**

Washington, D.C. 20549

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**FORM 6-K**

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**REPORT OF FOREIGN PRIVATE ISSUER**

**Pursuant to Rule 13a-16 or 15d-16 of  
the Securities Exchange Act of 1934**

September 30, 2006

333-115865-06

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**Inmarsat Group Limited**

(Exact name of Registrant as specified in its charter)

**Inmarsat Group Limited**

(Translation of Registrant's name into English)

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**England and Wales**

(Jurisdiction of incorporation or organization)

**99 City Road, London**

**United Kingdom, EC1Y 1AX**  
(Address of principal executive office)

333-115865-06

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**Inmarsat Finance plc**

(Exact name of Registrant as specified in its charter)

# Inmarsat Finance plc

(Translation of Registrant's name into English)

---

**England and Wales**

(Jurisdiction of incorporation or organization)

**99 City Road, London**

**United Kingdom, EC1Y 1AX**

(Address of principal executive office)

**333-115865**

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Indicate by check mark whether the Registrant files or will file annual reports under cover Form 20-F or Form 40-F.

20-F  40-F

Indicate by check mark whether the Registrant is submitting the Form 6-K in paper as permitted by Regulation S-T Rule 101(b) (1):-

Indicate by check mark whether the Registrant is submitting the Form 6-K in paper as permitted by Regulation S-T Rule 101(b) (7):-

Indicate by check mark whether by furnishing the information contained in this Form, the registrant is also thereby furnishing the information to the Commission pursuant to Rule 12g3-2(b) under the Securities Exchange Act of 1934.

Yes  No

If "Yes" is marked, indicate below the file number assigned to the registrant in connection with Rule 12g3-2(b):  
82-

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**INMARSAT GROUP LIMITED**  
**CONDENSED CONSOLIDATED FINANCIAL RESULTS**  
**For the three and nine months ended**  
**September 30, 2006**  
**(unaudited)**



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	As at September 30,	
	2006	2005
	(000's)	
<b>Active terminals<sup>(1)(2)</sup></b>		
Maritime	137.3	120.6
Land	82.1	76.2
Aeronautical	7.4	6.6
<b>Total active terminals</b>	<b>226.8</b>	<b>203.4</b>

- (1) Active terminals are the number of subscribers (BGAN and R-BGAN) or terminals that have been used to access services at any time during the preceding twelve-month period (other services except hand-held) registered at September 30. Active hand-held terminals are the average number of terminals active on a daily basis during the period.
- (2) Active terminals as at September 30, 2006 include 10,388 ACeS terminals and 5,547 BGAN subscribers (as at September 30, 2005: nil and nil, respectively). The average daily active number of hand-held SIM cards was 14,274.

During the three months ended September 30, 2006, revenues from mobile satellite communication services were US\$127.3 million, an increase of US\$11.5 million, or 10%, compared with the three months ended September 30, 2005. Growth has been strong in all sectors as a result of continued success in the newer services such as Fleet and Swift 64 and following the launch of BGAN in December 2005. The maritime, land, aeronautical and leasing sectors accounted for 57%, 24%, 6% and 13% of total revenues from mobile satellite communication services respectively during the three months ended September 30, 2006. Active terminal numbers have increased by 12% between September 30, 2005 and September 30, 2006 through growth in the maritime and aeronautical sectors plus the addition of ACeS hand-held terminals in September 2006.

*Maritime Sector.* During the three months ended September 30, 2006, revenues from the maritime sector were US\$72.6 million, an increase of US\$5.5 million, or 8%, compared with the three months ended September 30, 2005. This principally reflects an increase in data revenues.

Revenues from data services in the maritime sector during the three months ended September 30, 2006 were US\$47.1 million, an increase of US\$4.6 million, or 11%, compared with the three months ended September 30, 2005. The increase in revenues from data services reflects greater demand, as a result of the continued take-up and strong usage of our Fleet services. Demand for Fleet terminals has also been driven by growth in the global shipping fleet new-build market.

Revenues from voice services in the maritime sector during the three months ended September 30, 2006 were US\$25.5 million, an increase of US\$0.9 million or 4% compared with the three months ended September 30, 2005. Historically our voice revenues for the maritime sector have been affected by the migration of users from our higher-priced analogue service to our lower-priced digital services and to a lesser extent by competition. This has been more than offset by growth in both our newer Fleet service and various promotions we have initiated to respond to increased competition in certain of our established services.

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Revenues from BGAN services during the nine months ended September 30, 2006 are set out in the table below. These figures include voice, data and subscription revenues. As at September 30, 2006 there were 5,547 active BGAN subscribers.

	Three months ended			Nine months ended
	March 31, 2006	June 30, 2006	September 30, 2006	September 30, 2006
<b>BGAN Services</b>				
Revenues (US\$ in millions)	0.5	1.6	3.2	5.3
Active subscribers	2,113	3,367	5,547	5,547

*Aeronautical Sector.* During the three months ended September 30, 2006, revenues from the aeronautical sector were US\$8.0 million, an increase of US\$2.3 million, or 40%, compared with the three months ended September 30, 2005. The increase continues to be attributed primarily to the Swift 64 high-speed data service, which targets the government aircraft and business jet markets as well as being used by commercial airlines. In addition revenues for low-speed data services benefited from increased industry demand.

*Leasing.* During the three months ended September 30, 2006, revenues from leasing were US\$16.3 million, an increase of US\$2.2 million, or 16%, compared with the three months ended September 30, 2005 as a result of a new aeronautical Swift 64 lease.

*Subsidiary revenues.* Following the disposal of Invsat Limited and the business and assets of Rydex Corporation Limited in September 2005 and October 2005 respectively, subsidiary revenues were US\$nil for the three months ended September 30, 2006, compared to US\$3.0 million in the three months ended September 30, 2005.

*Other income.* Other income was US\$1.9 million for the three months ended September 30, 2006, an increase of US\$0.7 million, or 58%, compared with the three months ended September 30, 2005 as a result of the provision of additional in-orbit support services. Other income consists primarily of income from the provision of conference facilities, renting surplus office space, fees for in-orbit support services and revenue from sales of R-BGAN end user terminals.

*Seasonality.* Revenues are impacted by volume discounts that increase over the course of the financial year. There are lower discount levels in early quarters representing the minimum annual discount and higher discount levels in later quarters, as distribution partners meet specific volume thresholds, resulting in lower prices beyond the level of the minimum annual discount. Additionally, in 2006 and future years, the total amount of volume discounts will be affected by the merger of Xantic B.V. with Stratos Global Corporation which serves to increase the amount of revenues attributed to a single distribution partner.

## CERTIFICATE OF SERVICE

I, Julia Colish, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that on this 22nd day of November 2006, served a true copy of the foregoing by first-class United States mail, postage prepaid, upon the following:

Henrik Norrelykke  
Thrane & Thrane Airtime Ltd.  
509 Viking Drive  
Suites K, L & M  
Virginia Beach, VA 23452

Alfred M. Mamlet  
Steptoe & Johnson LLP  
1330 Connecticut Avenue N.W.  
Washington, D.C. 20036

Counsel for Stratos Communications, Inc.

Keith H. Fagan  
Telenor Satellite, Inc.  
1101 Wootton Parkway  
10<sup>th</sup> Floor  
Rockville, MD 20852

Diane J. Cornell  
Vice President, Government Affairs  
Inmarsat, Inc.  
1100 Wilson Blvd, Suite 1425  
Arlington, VA 22209

John P. Janka  
Jeffrey A. Marks  
Latham & Watkins LLP  
555 Eleventh Street, N.W.  
Suite 1000  
Washington, DC 20004

Linda J. Cicco  
BT Americas Inc.  
11440 Commerce Park Drive  
Reston, VA 20191

William K. Coulter  
DLA Piper Rudnick Gray Cary US LLP  
1200 Nineteenth Street, N.W.  
Washington, DC 20036-2412

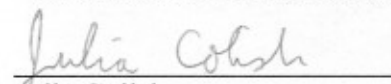
Lawrence J. Movshin  
Stephen L. Goodman  
Lee J. Rosen  
Wilkinson Barker Knauer, LLP  
2300 N St. NW, Suite 700  
Washington, DC 20037

Counsel for FTMSC US, LLC

Counsel for MVS USA, Inc.

Eric Fishman  
Holland & Knight LLP  
2099 Pennsylvania Avenue, NW  
Suite 100  
Washington, DC 20006

Counsel for Thrane & Thrane Airtime Ltd.

  
\_\_\_\_\_  
Julia Colish

\*By electronic mail