

ORIGINAL

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

AUG - 1 2006

Federal Communications Commission
Office of Secretary

In the matter of)
)
Thrane & Thrane Airtime Ltd.)
Application for Blanket License to Operate)
Mobile Earth Terminals with Inmarsat 4F2 at)
52.75°W)

File No. SES-LFS-20060522-00852
(Call Sign E060179)

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AUG 03 2006

Satellite Division
International-Bureau

REPLY TO OPPOSITIONS TO PETITION TO HOLD IN ABEYANCE

Mobile Satellite Ventures Subsidiary LLC ("MSV") hereby files this Reply to the Oppositions of Thrane & Thrane Airtime Ltd. ("Thrane & Thrane") and Inmarsat Ventures Limited ("Inmarsat") to MSV's Petition to Hold in Abeyance the above-referenced application.¹ Thrane & Thrane seeks to operate Broadband Global Area Network ("BGAN") terminals in the United States with an uncoordinated Inmarsat-4 L band satellite (Inmarsat 4F2 at 52.75°W). As MSV explained in its Petition, the International Bureau ("Bureau") should not grant this application unless and until the new Inmarsat 4F2 satellite has been coordinated, due to the harmful interference that would result without coordination, including to MSV and the important services it provides to federal, state, and local public safety organizations.

In their Oppositions, Thrane & Thrane and Inmarsat incorporate by reference pleadings from previous proceedings. MSV hereby incorporates by reference the following replies to these pleadings as filed in those previous proceedings:

- Letter from Ms. Jennifer A. Manner, MSV, to Ms. Marlene H. Dortch, FCC, File No. SES-MFS-20051122-01614 et al. (July 18, 2006) (responding to the Opposition of Inmarsat and its distributors to MSV's request that, to the extent the Commission grants the pending applications to operate with the uncoordinated Inmarsat 4F2

¹ See Thrane & Thrane Airtime Ltd., Opposition, File No. SES-LFS-20060522-00852 (July 27, 2006); Inmarsat Ventures Limited, Opposition, File No. SES-LFS-20060522-00852 (July 27, 2006).

satellite despite the facts that (i) harmful interference will likely occur, (ii) grant of the applications prior to a coordination agreement is inconsistent with precedent, (iii) grant will condone Inmarsat's usurpation of spectrum coordinated by the United States and Canada as well as Inmarsat's continued abdication of its obligation to coordinate its satellites internationally, and (iv) grant would endorse the current inefficient, non-contiguous assignment of L band frequencies, then the Commission should attach certain conditions intended to mitigate some of this harm).

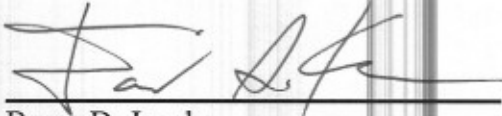
- Letter from Ms. Jennifer A. Manner, MSV, to Ms. Marlene H. Dortch, FCC, Call Signs E010011 et al. (July 18, 2006) (responding to the Opposition of Inmarsat and its distributors to MSV's request that the Commission preclude Inmarsat from using frequencies licensed to and coordinated for MSV and MSV Canada).
- Reply of MSV, File No. SES-STA-20060310-00419 et al. (June 29, 2006) (responding to the Opposition of Inmarsat and its distributors to MSV's request that the Commission clarify the conditions applicable to grants of Special Temporary Authority ("STA") to provide BGAN services over Inmarsat 4F2).
- Reply of MSV, File No. SES-MFS-20060118-00050 et al. (March 28, 2006) (responding to Inmarsat's Opposition to MSV's Petition to Hold in Abeyance Telenor Satellite Inc.'s application to provide non-BGAN Inmarsat service over Inmarsat 4F2).
- Reply of MSV, File No. SES-LFS-20051123-01634 et al. (February 7, 2006) (responding to Inmarsat's Opposition to MSV's Petition to Hold in Abeyance MVS USA, Inc.'s application to provide BGAN service over Inmarsat 4F2).

While Thrane & Thrane claims that the Commission has in the past considered the national security and law enforcement concerns presented by its use of Inmarsat satellites, it also admits that it has not yet entered into a security agreement with the Executive Branch to address the unique concerns presented by the operation of BGAN terminals with the Inmarsat 4F2 satellite, including the use of gateway earth stations in Europe. *Thrane & Thrane Opposition at* 3. The Bureau should accordingly defer consideration of the Thrane & Thrane application until Thrane & Thrane reaches an agreement with the Executive Branch that addresses these concerns.

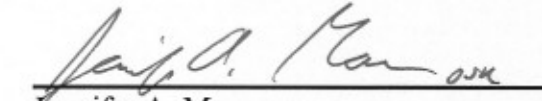
Conclusion

Based on the foregoing, the Bureau should hold in abeyance the Thrane & Thrane application.

Respectfully submitted,



Bruce D. Jacobs
David S. Konczal
**PILLSBURY WINTHROP
SHAW PITTMAN LLP**
2300 N Street, NW
Washington, DC 20037-1128
(202) 663-8000



Jennifer A. Manner
Vice President, Regulatory Affairs
**MOBILE SATELLITE VENTURES
SUBSIDIARY LLC**
10802 Parkridge Boulevard
Reston, Virginia 20191
(703) 390-2700

Dated: August 1, 2006

CERTIFICATE OF SERVICE

I, Sylvia Davis, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that on this 1st day of August 2006, I served a true copy of the foregoing by first-class United States mail, postage prepaid, upon the following:

John Giusti*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Gardner Foster*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Richard Engelman*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Howard Griboff*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Robert Nelson*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Stephen Dual*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Scott Kotler*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Roderick Porter*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

John Martin*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Cassandra Thomas*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Fern Jarmulnek*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Andrea Kelly*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Kathryn Medley*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

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

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

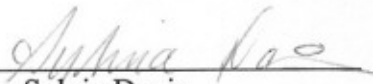
Counsel Thrane & Thrane Airtime Ltd.

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

Counsel for Inmarsat

*By electronic mail

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


Sylvia Davis