STEPTOE & JOHNSON LLP

ATTORNEYS AT LAW

ORIGINAL

Alfred M. Mamlet
202.429.6205
amamlet@steptoe.com

Marc A. Paul
202.429.6486
mpaul@steptoe.com

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
Tel 202.429.3000
Fax 202.429.3902
steptoe.com

November 21, 2003

BY HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th Street, S.W.
Washington, D.C. 20554

Re: **SkyWave Mobile Communications, Corp.**
Application for Blanket Authority to operate Mobile Earth Terminals
File No. SES-LIC-20030311-00353
Callgin: E030055

Dear Ms. Dortch:

On behalf of SkyWave Mobile Communications, Corp. ("SkyWave"), this letter is being submitted to notify the Commission that SkyWave will modify its U.S. mobile earth terminals ("METs") to facilitate average shutdown times of 1.35 seconds, and a maximum shutdown time of 2.6 seconds. These changes will improve the protection for the Global Maritime Distress and Safety Service ("GMDSS") should the spectrum allocated for Inmarsat D+ services ever be needed for GMDSS.

As currently designed, the SkyWave D+ terminals use the Inmarsat global beam and take anywhere from 20 seconds to 2 minutes to shut down in response to a shutdown command. SkyWave will be able to reduce these shutdown times by making software and hardware modifications to the METs to permit them to use Inmarsat's regional spot beams on its third generation of satellites. The spot beams have 2 second transmit slots. In addition, the METs will be modified to monitor continuously a traffic channel. To the extent that preemption is required, the land earth station ("LES") will disable the traffic channel and the MET will be preempted in the next 2 second transmit timeslot. Since the D+ METs are half-duplex terminals, any METs currently transmitting will continue transmitting until the end of the 2 second transmit burst. As a result, for METs with transmissions in progress when a

preempt command is received, preemption will occur, on average, in 1.35 seconds if the METs are operating in spot beam mode, and in a maximum of 2.6 seconds.[1]

As set forth in the SkyWave application, the D+ channels used by SkyWave are not taken from the pool of channels used for the other Inmarsat services -- rather, the leased channels are dedicated for use by SkyWave only for the D+ service. Accordingly, SkyWave's D+ service will not affect the real time priority and preemption for GMDSS by taking away any spectrum allocated for another service, such as Inmarsat B or Inmarsat C, that is used for GMDSS. However, should Inmarsat require use of the D+ spectrum for use by GMDSS, the modifications made to SkyWave's METs will allow for sufficient shutdown times to protect GMDSS.

SkyWave will make the software and hardware modifications to its METs within 6 months of the Commission's grant of its application for 25,000 D+ METs. Further, SkyWave will make any required hub modifications to the LES within 12 months of the Commission's grant of its application. SkyWave will advise the Commission and NTIA by letter when the MET and hub modifications to the LES have been completed. If and when Inmarsat informs SkyWave that the D+ spectrum may be needed for GMDSS, SkyWave will then work with Inmarsat to implement within 30 days a lease of regional spot beam capacity on Inmarsat's satellites in order to facilitate the reduced shutdown times set forth above.

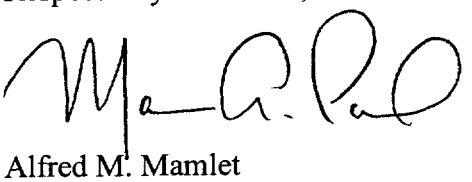
With the undertakings outlined above, SkyWave respectfully believes that the above-pending application should be granted by the Commission.

---

[1] This average is calculated by looking at the maximum preemption time of 2.6 seconds (this includes the 2.0 second transmit burst, as well as time used by the MET for detection, and transition to receive mode) and a minimum preemption time of 0.1 second. As a practical matter, only a very small fraction of SkyWave's authorized D+ METs will be transmitting when a preempt command is given, thereby minimizing the spectrum used (at any one point in time) by SkyWave that might otherwise be used for GMDSS. For example, if SkyWave has 25,000 D+ METs operating in the United States, it is reasonable to assume that 50% of those terminals will report hourly and 50% twice daily. As a result, the average number of terminals transmitting in any timeslot is 9. On average, when a preemption command is given, 9 terminals will continue transmitting for an average of 1.35 seconds and then all terminals (including these 9 terminals) will be inhibited from any further transmissions.

Please do not hesitate to contact us if you have any questions concerning this submission or SkyWave's pending application for blanket authority to operate Inmarsat D+ terminals in the United States.

Respectfully submitted,



Alfred M. Mamlet
Marc A. Paul

cc: James Vorhies (NTIA)
Christopher Hofer (NTIA)
Cassandra Thomas (International Bureau)
Sylvia Lam (International Bureau)