

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

In the matter of)
)
iPass, Inc.) SES-LIC-20070712-00933 (Call Sign E070144)

OPPOSITION OF INMARSAT VENTURES LIMITED

Inmarsat Ventures Limited (“Inmarsat”) opposes Mobile Satellite Ventures
Subsidiary LLC’s (“MSV’s”) Petition to Hold in Abeyance (“Petition”) the application of iPass,
Inc. (“iPass”) for “full” authority to provide Broadband Global Area Network (“BGAN”) service
over the Inmarsat-4 (“I-4”) spacecraft.

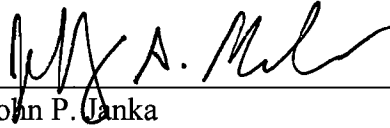
MSV’s Petition repeats arguments to which Inmarsat has fully responded in
dozens of pleadings submitted in analogous contexts. Because MSV raises no new allegations or
arguments in its Petition, and in the interest of conserving Commission resources, Inmarsat
responds to the Petition by incorporating by reference its previously filed responses to MSV’s
many pleadings.¹

For the reasons set forth in the dozens of pleadings submitted by Inmarsat in
response to MSV’s efforts to obstruct the provision of Inmarsat services to the United States, the

¹ See, e.g., Joint Letter from Inmarsat *et al.* to Marlene H. Dortch, FCC, File Nos. SES-MFS-20051122-01614 *et al.* (Jul. 6, 2006); Joint Letter from Inmarsat *et al.* to Marlene H. Dortch, FCC, Call Signs E010011 *et al.* (Jul. 6, 2006); Letter from Inmarsat to Marlene H. Dortch, FCC, File No. SES-STA-20060522-00857 (Jun. 21, 2006), attaching Joint Opposition to Petition for Clarification, File No. SES-STA-20060310-00419 *et al.* (Jun. 19, 2006); Opposition of Inmarsat, File No. SES-MFS-20060118-00050, *et al.* (Mar. 16, 2006); Opposition of Inmarsat, File No. SES-LFS-20051123-01634, *et al.* (Jan. 26, 2006).

Commission should deny MSV's Petition to Hold in Abeyance and grant the iPass application for authority to provide BGAN service without delay.

Respectfully submitted,



John P. Janka
Jeffrey A. Marks
LATHAM & WATKINS LLP
555 Eleventh Street, NW
Suite 1000
Washington, DC 20004
Telephone: (202) 637-2200

Diane J. Cornell
Vice President, Government Affairs
INMARSAT, INC.
1101 Connecticut Avenue, NW
Suite 1200
Washington, DC 20036
Telephone: (202) 248-5155

September 27, 2007

CERTIFICATE OF SERVICE

I, Jeffrey A. Marks, hereby certify that on this 27th day of September, 2007, I caused to be served a true copy of the foregoing "Opposition" by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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

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

JoAnn Ekblad*
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

Gardner Foster*
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

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

Karl Kensinger*
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

John Martin*
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

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

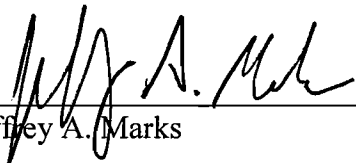
Cassandra Thomas*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Bruce Posey
iPass, Inc.
3800 Bridge Parkway
Redwood Shores, CA 94065

Bruce D. Jacobs
Tony Lin
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, N.W.
Washington, DC 20037-1128

Jennifer A. Manner
Vice President, Regulatory Affairs
Mobile Satellite Ventures Subsidiary LLC
1002 Park Ridge Boulevard
Reston, Virginia 20191

**Via Electronic Mail*



Jeffrey A. Marks