

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

ORIGINAL  
FILED/ACCEPTED

OCT - 5 2007

Federal Communications Commission  
Office of the Secretary

In the matter of )  
)  
iPass, Inc. )  
Application for Blanket License to ) SES-LIC-20070712-00933 (Call Sign E070144)  
Operate Mobile Earth Terminals )  
with Inmarsat 4F2 at 52.75°W )

**REPLY TO OPPOSITIONS TO PETITION TO HOLD IN ABEYANCE**

Mobile Satellite Ventures Subsidiary LLC (“MSV”) hereby files this Reply to the Oppositions of iPass, Inc. (“iPass”) and Inmarsat Ventures Limited (“Inmarsat”) to MSV’s Petition to Hold in Abeyance the above-referenced application.<sup>1</sup> iPass 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 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, iPass and Inmarsat incorporate by reference pleadings from other BGAN application proceedings. MSV hereby incorporates by reference the following filings responsive to those pleadings:

- 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 the Commission should attach certain conditions intended to mitigate potential interference from the operation of the

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<sup>1</sup> See iPass, Inc. Opposition (September 27, 2007); Inmarsat Ventures Limited, Opposition (September 27, 2007).

uncoordinated Inmarsat 4F2 satellite, to the extent the Commission grants applications to operate with that satellite).

- 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 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).
- Reply of MSV, File No. SES-STA-20070112-00112 (February 12, 2007) (responding to the Oppositions of iPass and Inmarsat to MSV's Petition to Hold in Abeyance iPass's STA application to provide BGAN service over Inmarsat 4F2).
- Reply of MSV, File No. SES-LFS-20060522-00852 (August 3, 2007) (responding to the Oppositions of Thrane & Thrane Airtime Ltd. and Inmarsat to the Petition to Hold in Abeyance the application of Thrane & Thrane Airtime Ltd. to provide BGAN service over Inmarsat 4F2).
- Reply of MSV, File Nos. SES-LFS-20060303-00343 and SES-AMD-20060316-00448 (May 4, 2006) (responding to the Oppositions of BT Americas Inc. and Inmarsat to the Petition to Hold in Abeyance the application of BT Americas Inc. to provide BGAN service over Inmarsat 4F2).
- Reply of MSV, File No. SES-LFS-20051123-01634 (February 7, 2006) (responding to the Oppositions of MVS USA, Inc. and Inmarsat to the Petition to Hold in Abeyance the application of MVS USA, Inc. to provide BGAN service over Inmarsat 4F2).
- Opposition to Motion to Strike by MSV, File No. SES-LFS-20051123-01634 (February 7, 2006) (responding to the argument that the confidential portions of the Petition to Hold in Abeyance the BGAN application of MVS USA, Inc. should be stricken from the record).

As an additional matter, iPass admits in its Opposition 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. iPass Opposition at 6. Accordingly, as iPass concedes, the Bureau should defer consideration of the iPass application until it reaches an agreement with the Executive Branch that addresses these concerns.

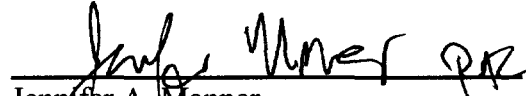
**Conclusion**

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

Respectfully submitted,



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Dated: October 5, 2007

## CERTIFICATE OF SERVICE

I, Julia Colish, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that on this 5<sup>th</sup> day of October 2007, I served a true copy of the foregoing **“REPLY TO OPPOSITIONS TO PETITION TO HOLD IN ABEYANCE”** by first-class United States mail, postage prepaid, upon the following:

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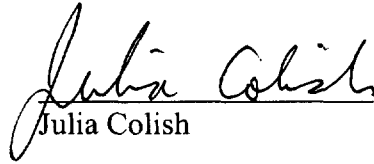
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