

November 6, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Attn: Roderick Porter, Deputy Chief
International Bureau

Re: *Notice of Oral Ex Parte Presentation*
iPass, Inc.
Call Sign E070144
File Nos. SES-STA-20070716-00944 and SES-LIC-20070712-00933

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), iPass, Inc. ("iPass"), by counsel, hereby notifies the Commission of an *ex parte* presentation with representatives of iPass and International Bureau staff.¹ In attendance from the International Bureau were: Roderick Porter, Deputy Bureau Chief; Bob Nelson, Chief, Satellite Division; Karl Kensinger, Associate Division Chief, Satellite Division; and Scott Kotler, Chief, Systems Analysis Branch, Satellite Division. In attendance for iPass were: David Hawkins, Director of Business Development, iPass; and Kathryn A. Zachem and the undersigned of Wilkinson Barker Knauer, LLP, counsel for iPass.

In its STA request, iPass discussed the public safety, law enforcement and homeland security benefits underlying its pending request for Special Temporary Authority to operate up to 4000 Mobile Earth Terminals to provide Inmarsat's Broadband Global Area Network (BGAN) services. iPass currently provides its enterprise customers, including existing government users, with a comprehensive global broadband connectivity solution employing broadband and wireless technology, bundled with a suite of automated device life-cycle management and security validation software and services. Mr. Hawkins explained that current iPass customers include a

¹ These applications have been designated as "permit-but-disclose" proceedings. See Public Notice, Report. No. SES-00973 (IB rel. Oct. 17, 2007). While the *ex parte* presentation focused on the merits of the pending STA request, insofar as the presentation may be relevant to the Bureau's consideration of the underlying application copies have been filed separately there as well.

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number of governmental agencies with important law enforcement or public safety missions. These government users already employ iPass's service, and many have *already* indicated their desire for access to iPass's solution via Inmarsat's mobile satellite BGAN technology platform – a fact that underscores the important and immediate public interest benefits that will be achieved by a prompt grant of the requested STA.

Mr. Hawkins also explained that upon grant of the STA, iPass will be positioned to initiate its BGAN offering within a short period of time. iPass anticipates that it would be able to initiate BGAN service within 45 business days after grant of the STA to its existing customers. iPass already maintains contractual and service provider arrangements with Federal government agencies, and BGAN service can be incorporated into these existing arrangements seamlessly within a short period of time. iPass has also already resolved a number of critical time-consuming technical measures in close coordination with Inmarsat over the past several months, such as software development and establishment of mobile terminal registration and authentication protocols. For security and fiscal reasons, government agencies using iPass's platform prefer that the offering be available via a comprehensive "one-stop" solution, rather than through intermediary service providers, and grant of the STA request will enable iPass to provide BGAN service in this optimal manner.

Mr. Hawkins also discussed a number of iPass's existing relationships with Federal government users. An overview of these and other iPass relationships follows:

- ***Dept. of Homeland Security (FEMA).*** The Federal Emergency Management Agency ("FEMA") of the US Department of Homeland Security is an iPass customer and relies on its iPass service to meet communications needs in addressing public safety requirements during national emergencies.
- ***Dept. of Treasury (ATF).*** The Bureau of Alcohol Tobacco and Firearms is a customer who relies on iPass service in the execution of its law enforcement and related regulatory activities. The iPass service has been lauded as a key productivity tool in increasing Agent productivity by 20%. Agents have used these tools throughout the US and internationally, and even to ensure public safety during the 2006 Major League Baseball All Star game.
- ***Department of Defense.*** The United States Air Force and United States Army are both iPass customers.
- ***State and Local Governments.*** The local police departments of Prince William County, Virginia and St. Paul, Minnesota, are both iPass customers.

Other Federal government law enforcement agencies are using iPass service as part of pilot projects involving an iPass reseller.

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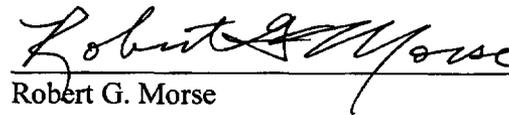
In conclusion, iPass is already an established provider of secure broadband connectivity services to government agencies, including agencies with a public safety and homeland security mission, and is capable of initiating competitive BGAN service in a short time frame after obtaining STA approval. For the reasons discussed herein and in iPass's pending STA request, the public safety benefits of granting iPass's STA are real and expeditious grant of the request is clearly in the public interest.

An original and five copies are being submitted.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

By:


Robert G. Morse

cc: Roderick Porter
Bob Nelson
Karl Kensinger
Scott Kotler
Gardner Foster