

Accepted / Filed

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

MAY 11 2015  
 Federal Communications Commission  
 Office of the Secretary

In the Matter of	)	
	)	
Inmarsat Mobile Networks, Inc.	)	File Nos. SES-LIC-20120426-00397,
	)	SES-AMD-20120823-00781, and SES-
Application to Operate a Fixed-Satellite	)	AMD-20150114-00008
Service Gateway Earth Station Facility in	)	
Lino Lakes, Minnesota with the Inmarsat-5	)	Call Sign: E120072
F2 Space Station	)	
	)	

**OPPOSITION TO PETITION FOR RECONSIDERATION OR CLARIFICATION**

Inmarsat Mobile Networks, Inc. (“Inmarsat”) opposes the petition for reconsideration or clarification (“Petition”) of Iridium Satellite LLC (“Iridium”) in this proceeding. The Petition relates to the March 30, 2015 grant of authority for Inmarsat to operate a gateway earth station at Lino Lakes, Minnesota, communicating with the Ka band GSO FSS Inmarsat-5 F2 spacecraft (“Inmarsat-5 F2”), which operates under the authority of the United Kingdom at 55° W.L.<sup>1</sup> Iridium requests modifications and clarifications to the *Order* that are inconsistent with the terms of coordination between Inmarsat and Iridium, and that could prejudice future coordination between the operators.

In the *Order*, the Commission granted Inmarsat authority to conduct uplink operations from the Lino Lakes gateway in parts of the Ka band, including the 29.1-29.25 GHz segment. Because this segment is designated for LMDS transmissions and NGSO MSS feeder links on a co-primary basis, and there is no designation for GSO FSS in this band, the Commission

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<sup>1</sup> See *Inmarsat Mobile Networks, Inc., Application to Operate a Fixed-Satellite Service Gateway Earth Station Facility in Lino Lakes, Minnesota, with the Inmarsat-5 F2 Space Station*, File Nos. SES-LIC-20120426-00397, SES-AMD-20120823-00781, and SES-AMD-20150114-00008, Call Sign E120072, Order and Authorization and Declaratory Ruling, DA 15-392 (rel. Mar. 30, 2015) (“*Order*”).

conditioned its grant of authority on “Inmarsat [] ceas[ing] operations in the event of any interference into LMDS or MSS feeder link operations. In addition, Inmarsat may not claim interference protection from LMDS or MSS feeder link operations in this frequency band.”<sup>2</sup>

The Commission’s grant of authority to operate in the 29.1-29.25 GHz band segment was based on its determination that the geographic separation of the Lino Lakes gateway from Iridium’s gateway locations, agreed during the course of coordination, provided sufficient spatial isolation to allow Inmarsat’s use of the band without causing harmful interference to Iridium’s system.<sup>3</sup> The Commission recognized that this sharing technique, agreed upon to protect Iridium’s feeder link operations at 29.25-29.5 GHz band, adequately protects Iridium’s MSS feeder link operations at 29.1-29.25 GHz in the same manner.<sup>4</sup>

In its Petition, Iridium requests that the International Bureau (the “Bureau”) reconsider its grant of authority in the *Order* for Inmarsat’s operations in the 29.1-29.25 GHz band to reference explicitly the relationship of that authority to future MSS feeder link stations that Iridium may deploy. In addition, Iridium asks that the Bureau “clarify” that Inmarsat may not claim interference protection for its spacecraft receivers with respect to any Iridium MSS feeder link operations in the 29.1-29.25 GHz band, and Iridium apparently seeks to impose that condition notwithstanding the terms of its coordination with Inmarsat.

Iridium’s request for reconsideration or clarification is unwarranted and unnecessary. As a threshold matter, the operations of Lino Lakes will be entirely within the technical envelope defined by the terms of coordination between the operators, which cover both the earth stations and space stations for the Iridium and Inmarsat networks,

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<sup>2</sup> *Order* ¶ 41.

<sup>3</sup> *Id.* ¶ 17.

<sup>4</sup> *Order* ¶ 17.

. Iridium's request to expand the ordering condition to cover future feeder link stations could inadvertently change the terms of coordination and improperly expand the scope of Iridium's rights under those agreements. Inmarsat urges the Commission to refrain from taking action on reconsideration that could undermine the results of coordination.

Moreover, under the terms of coordination, technical compatibility in the 29.1-29.25 GHz band segment is ensured for the same reason it is ensured at 29.25-29.3 GHz. Any future Iridium MSS feeder link operations will need to be implemented under the terms of coordination, just as the Lino Lakes gateway was implemented in a manner consistent with coordination. Changing the terms under which future Iridium MSS feeder link operations would otherwise need to be implemented, as Iridium seeks to do by its Petition, could impede the willingness of parties to enter into coordination agreements in the future.

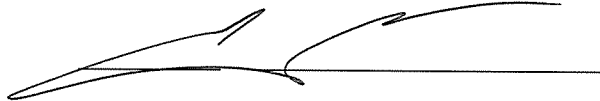
Finally, Inmarsat respectfully requests that the Commission decline to apply the non-interference condition specifically to the receivers on the Inmarsat-5 F2 satellite, as Iridium requests in the Petition. As an initial matter, this condition is unnecessary because the operations of the Lino Lakes gateway with Inmarsat-5 F2 will be fully consistent with the terms of Inmarsat's coordination with Iridium. Moreover, such a condition would be overbroad. Inmarsat-5 F2 is authorized by the United Kingdom, and serves a large geographic area outside the United States that is covered by the terms of coordination. Thus, the receivers on the spacecraft receive signals from other parts of the world. Any terms of U.S. market access that apply to Inmarsat operations with respect to the United States should not reflexively be extended to operations outside of the United States, where the U.S. spectrum band plan does not apply.

\* \* \* \* \*

Iridium's request to modify conditions applicable to Inmarsat's operations are unnecessary and overbroad. Inmarsat's operations at 29.1-29.25 GHz already are governed by the terms of coordination between Inmarsat and Iridium,

and also govern space station interference protection with respect to operations outside the United States. Therefore, Inmarsat respectfully requests that Iridium's Petition be denied.

Respectfully submitted,



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May 11, 2015

**CERTIFICATE OF SERVICE**

I, Elizabeth R. Park, hereby certify that on this 11th day of May, 2015, I served a true copy of the foregoing Opposition of Inmarsat to the Petition for Reconsideration or Clarification of Iridium via electronic mail (to parties that have consented to electronic service in this proceeding), or, where indicated, via first-class U.S. mail, upon the following:

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