

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

In the Matter of)	
)	
General Dynamics Satellite)	SES-LIC-20160722-00673
Communication Services, LLC)	
)	
Application for Authority)	

COMMENTS OF INMARSAT

Inmarsat Inc. (“Inmarsat”) hereby comments on the application of General Dynamics Satellite Communications Services, LLC (“General Dynamics”) for authority to operate a fixed earth station in 19.4-19.6 GHz and 29.1-29.25 GHz portions of the Ka-band, in Tobyhanna, Pennsylvania.¹ Through its application, General Dynamics seeks authorization to communicate with the Iridium NGSO mobile satellite service constellation over the spectrum used by that system for feeder link operations. Inmarsat respectfully requests that, should the Federal Communications Commission decide to grant this application, it condition the grant on General Dynamics on coordination with Inmarsat prior to commencing operations from the earth station.

Inmarsat operates a global satellite communications system that includes three of its Inmarsat-5 series space stations, which operate in the Ka-band and provide the company’s innovative Global Xpress broadband satellite service. These satellites, located at 62.6° E.L., 55.0° W.L., and 179.6° E.L., conduct gateway operations in the 17.7-20.2 GHz and 27.5-30.0 GHz bands. The satellites also have the capability to operate steerable user link beams in the 19.2-19.7 GHz and 29-29.5 GHz bands. The Inmarsat-5 satellites operate under the authority of

¹ See Application of General Dynamics Satellite Communications Services, LLC, SES-LIC-20160722-00673; see also Satellite Communications Services Satellite Radio Applications Accepted for Filing, *Public Notice*, Report No. SES-01878 (Aug. 17, 2016).

the United Kingdom, and Inmarsat holds authorization to serve the United States from the Inmarsat-5 F2 and Inmarsat-5 F3 satellites.²

Pursuant to the provisions of the Radio Regulations and the International Table of Frequency Allocations,³ there is a coordination agreement in place between Inmarsat Global Ltd. and Iridium Satellite LLC (“Iridium”) covering the earth stations and space stations of both operators. This agreement contemplates good faith coordination of future gateway earth stations deployed by the operators. At the time of the negotiations leading to this agreement, Iridium had not finalized the location of the General Dynamics earth station that is the subject of the present application. Now that the location and other parameters of the Tobyhanna earth station are known, the operators can complete coordination also with respect to this earth station, ensuring that its operation is consistent with the existing agreement. Inmarsat has reached out to both General Dynamics and Iridium to commence relevant discussions. Inmarsat is optimistic that these discussions can be conducted promptly and efficiently, and the company will notify the Commission when coordination has been completed for the new earth station. Should the Commission decide to grant the General Dynamics application in the interim, however, and consistent with Commission rules and precedent,⁴ Inmarsat respectfully requests that the

² Inmarsat Mobile Networks, Inc., SES-LIC-20120426-00397, *Order and Authorization and Declaratory Ruling*, 30 FCC Rcd 2770 (2015); Satellite Communications Services Information Actions Taken, *Public Notice*, Report No. SES-01818 (Jan. 27, 2016).

³ *See, e.g.*, 47 C.F.R. § 2.106 nn. 5.523D & 5.535A (making use of the relevant bands subject to coordination). Although Inmarsat’s 29.1-29.25 GHz feeder link operations to and from its Lino Lakes, Minnesota gateway are conducted on a non-interference basis with respect to Iridium’s NGSO MSS feeder link operations under the terms of Inmarsat’s existing U.S. market access grants, the United Kingdom-authorized Inmarsat-5 F2 serves a large geographic area *outside the United States* that is covered by the terms of the coordination agreement between Inmarsat and Iridium and that could be affected by the operation of the new Tobyhanna earth station.

⁴ The Commission’s rules contemplate the imposition of conditions related to ITU coordination in circumstances such as these. Section 111(b) provides: (i) “[n]o protection from interference

Commission condition its grant on coordination of the new earth station with Inmarsat-5 F2 and F3, prior to commencing operations at the station.

Respectfully submitted,

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caused by radio stations authorized by other Administrations is guaranteed unless ITU procedures are timely completed or, with respect to individual Administrations, coordination agreements are successfully completed”; and (ii) “[a] license for which such procedures have not been completed may be subject to additional terms and conditions required for coordination of the frequency assignments with other Administrations.” 47 C.F.R. § 25.111(b).