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

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| | ) | |
| Satamatics, Inc. | ) | |
| Application for Modification of Blanket | ) | File No. SES-MFS-20051202-01665 |
| License to Operate Mobile Earth Terminals | ) | (Call Sign E020074) |
| with Inmarsat 4F2 at 52.75° W | ) | |

To: International Bureau

**OPPOSITION TO MSV PETITION TO HOLD IN ABEYANCE**

**Satamatics, Inc.**

Alfred M. Mamlet
Marc A. Paul
Brendan Kasper
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue NW
Washington, D.C. 20036-1795
(202) 429-3000

*Counsel for Satamatics, Inc..*

February 9, 2006

## TABLE OF CONTENTS

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

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| Satamatics, Inc. | ) | File No. SES-MFS-20051202-01665 |
| Application for Modification of Blanket License | ) | (Call Sign E020074) |
| to Operate Mobile Earth Terminals with Inmarsat | ) | |
| 4F2 at 52.75° W.L. | ) | |

To: International Bureau

**OPPOSITION TO MSV PETITION TO HOLD IN ABEYANCE**

Pursuant to Section 25.154(c) of the Commission's Rules, 47 C.F.R. § 25.154(c), Satamatics, Inc. ("Satamatics") hereby opposes Mobile Satellite Ventures Subsidiary LLC's ("MSV's") Petition to hold in abeyance the above-captioned application of Satamatics ("the Satamatics Application").[1]

## I. INTRODUCTION AND SUMMARY

Satamatics has filed an application to modify its existing authorization to operate Inmarsat D+ terminals to include the recently launched fourth-generation Inmarsat satellite

[1] *See* MSV Petition To Hold in Abeyance (Jan. 27, 2006) ("MSV Petition"). Concurrently with this Opposition, Satamatics is filing a Motion to Strike Portions of the MSV Petition. *See* Satamatics Motion to Strike (filed Feb. 9, 2006). As set forth in that Motion to Strike, the MSV Petition should be dismissed by the Bureau because it contains confidential information and redacted arguments that Satamatics has not been given access to by MSV, thereby depriving Satamatics of a full and fair opportunity to defend its applications. At a minimum, the Bureau cannot base any decision to hold in abeyance the Satamatics Application on what has been deemed confidential by MSV and withheld from Satamatics. To the extent that Satamatics is given access to the confidential information contained in the MSV Petition after this Opposition is filed, Satamatics reserves the right to amend this Opposition as necessary.

located at 52.75° W.L. ("Inmarsat 4F2") as a point of communication.[2] Satamatics is currently authorized to use a third generation Inmarsat satellite located at 54° W.L. to offer the Inmarsat D+ service to customers. Inmarsat migrated this service, along with other existing Inmarsat services, from that third generation satellite at 54° W.L. to the Inmarsat 4F2 at 52.75° W.L. on January 22, 2006.[3]

The Inmarsat D+ service that is the subject of the Satamatics Application is not new. Satamatics has been authorized to provide these Inmarsat services since 2003. To date, these services have been provided to customers without interference to or complaint from MSV. The Satamatics customers rely heavily on the existing Inmarsat services to facilitate law enforcement, homeland security and to protect, track and monitor sensitive assets throughout the United States. Any disruption to these services would be devastating to these essential activities and would not be in the public interest.

The MSV Petition should be either dismissed or denied by the Bureau as a transparent attempt to use the Satamatics Application as leverage in its on-going spectrum dispute with Inmarsat. MSV's spectrum dispute should be resolved through the agreed-upon mechanism for international coordination -- *i.e.,* the Mexico City Memorandum of Understanding ("Mexico City MOU") -- and not this proceeding. The Bureau should not allow MSV to treat Satamatics as a pawn in its dispute, especially when vital communications services are involved. The Satamatics Application satisfies the Commission's Rules and should be promptly granted by the Bureau.

---

[2] *See* File No. SES-MFS-20051202-01665.

[3] On January 18, 2006, Satamatics was granted special temporary authority ("STA") to use the Inmarsat 4F2 in advance of the Bureau's decision on its modification application to use the Inmarsat 4F2 as a point of communication. *See* File No. SES-STA-20051223-01790.

Contrary to the claims of MSV, a new international L-band coordination agreement is not needed before the Satamatics Application can be granted. Indeed, two MSV satellite applications (one for a replacement satellite at 101° W.L. and a new satellite at 63.5° W.L.) were granted by the Bureau last year on a non-harmful interference basis and in the absence of a new L-band coordination agreement. There is no justification for treating the Satamatics Application and its proposed use of the Inmarsat 4F2 satellite differently.

Despite what MSV may argue, the Satamatics Application clearly establishes that the existing Inmarsat services will be provided over the recently launched Inmarsat 4F2 satellite within the same technical envelope (*e.g.,* no greater EIRP spectral density, no unauthorized out-of-band emissions, and no need for greater interference protection) as these services are being provided today, and as a result, there will be no increased interference risk to MSV. MSV has not provided any technical evidence to suggest otherwise.

Finally, the Satamatics Application does not contain the additional issues claimed by MSV to warrant further "scrutiny" by the Bureau.[4] First, the proposed Inmarsat 4F2 satellite is properly considered a replacement satellite for the third generation Inmarsat satellite ("Inmarsat 3 satellite") at 54° W.L. because it will cover the same geographic areas as that satellite, and does not seek to use any additional L-band frequencies beyond those currently authorized. Second, despite MSV's suggestion otherwise, Section 25.210(j) of the Commission's Rules, 47 C.F.R. § 25.210(j), requiring FSS satellites to operate with +/- 0.05° East-West station keeping, does *not* apply to MSS satellites.

[4] *See* MSV Petition at 19-21.

The Bureau should promptly grant the Satamatics Application and allow U.S. consumers to continue to receive the Inmarsat D+ service, which they have come to rely on for almost three years.

## II. MSV HAS NOT PROVIDED A LEGITIMATE BASIS FOR DELAYING GRANT OF THE SATAMATICS APPLICATION

Rather than pursuing its spectrum dispute with Inmarsat as part of the established international coordination procedures for the L-band, MSV is attempting to use its Petition against the Satamatics Application as leverage for resolving an on-going and protracted L-band spectrum dispute with Inmarsat. Allowing MSV to do so would be inconsistent with the Commission's obligations under the Mexico City MoU, violate the *DISCO II* principles regarding the treatment of applications for access to foreign satellites licensed by WTO Member countries, and succeed in disrupting the delivery of an existing Inmarsat service to U.S. customers. The Bureau must reject the arguments in the MSV Petition.

### A. Grant of the Satamatics Application is in the Public Interest

Having been licensed for close to three years, the Satamatics Inmarsat D+ service is known by the Bureau and in the marketplace to offer a unique service to track and monitor sensitive assets throughout the country. The continued and uninterrupted distribution of this Inmarsat service in the U.S. is in the public interest. Satamatics' customers for Inmarsat services encompass a wide range of U.S. customers, including the U.S. military and private sector end-users.[5] U.S. military users include: the U.S. Coast Guard and the U.S. Navy.[6] U.S. private

---

[5] *See* Declaration of Brian Hester at ¶ 5 (Attachment B of File No. SES-STA-20051223-01790) (incorporated herein by reference).

[6] *See* Declaration of Brian Hester at ¶ 6.

sector customers include: Centerpoint Energy, M2M, American Electric Power, PS Energy, Halliburton, Chevron, Air Liquide, and Air Products.[7]

Grant of the Satamatics Application will ensure that these end-users do not experience any disruption to the Inmarsat services they currently use and rely on. Disruption of the Satamatics service would hinder U.S. Coast Guard and U.S. Navy homeland security efforts, including surveillance and warnings for potential terrorist hijackings of marine vessels. In addition, an interruption of service would compromise the ability of Satamatics' private sector clients to track their assets and to monitor sensitive energy facilities, including natural gas well heads, pipelines, shipping containers and service vehicles.[8]

### B. Grant of the Satamatics Application Should Not Be Delayed Pending Completion of a New L-band Coordination Agreement

MSV suggests that the Satamatics Application should be delayed "until an L band coordination agreement is concluded."[9] The absence of an L-band coordination agreement, however, is not an adequate justification for the Bureau to delay action on the Satamatics Application.

According to MSV, the Satamatics Application should be treated differently than other similar applications since "the spectrum management issues presented now are fundamentally different" because other L-band satellites, unlike the Inmarsat 4F2, that have been licensed in the absence of a coordination agreement at least "had already been coordinated in the past for narrowband carriers and were in the ITU Master Registry."[10] However, just last year,

---

[7] *See* Declaration of Brian Hester at ¶ 7.

[8] *See* Declaration of Brian Hester at ¶¶ 6 - 8.

[9] MSV Petition at iii.

[10] MSV Petition at 10-11.

the Bureau granted two MSV applications to operate in the L-band -- one for a replacement satellite at 101° W.L. and one for a new satellite (*i.e.,* a satellite not contemplated by the Mexico City MoU) at 63.5° W.L.[11] MSV ignores the fact that neither of these satellites had been coordinated in the past, and one of satellites uses carriers that are 25 times wider than those on the Inmarsat 4F2 satellite.[12] Rather than delaying action on either MSV application pending the completion of a new L-band coordination agreement, both applications were granted on a "non-harmful interference basis to other mobile-satellite service systems operating in the L-band."[13] Indeed, since the UK (the administration licensing the Inmarsat system and the home of the ultimate corporate parent of Satamatics) is a WTO Member, the U.S. has an obligation to do the same in this case.[14]

### C. Satamatics Should Not Be Prevented From Using Any Available Inmarsat Spectrum

MSV argues that "interference" will result from "Inmarsat's continued use of spectrum that it agreed to return to MSV and MSV Canada."[15] Implicitly, MSV seeks to exclude Satamatics from operating over this "disputed" spectrum when providing existing Inmarsat

---

[11] *See In the Matter of Mobile Satellite Ventures Subsidiary LLC,* DA 05-50 (rel. Jan. 10, 2005) ("*MSV 63.5° W.L. Order*"); *In the Matter of Mobile Satellite Ventures Subsidiary LLC,* DA 05-1492 (rel. May 23, 2005) ("*MSV 101° W.L. Order*").

[12] *See* File No. SAT-AMD-20031118-00335 at Appendix A, p.23.

[13] *See MSV 63.5° W.L. Order* at ¶ 39; *MSV 101° W.L. Order* at ¶ 59.

[14] *See TMI Market Access Order*, 14 FCC Rcd. at 20813 (rejecting the attempt of AMSC to preclude other L-band systems from serving the U.S. until AMSC had completed coordination of 20 MHz of spectrum because doing so "would be inconsistent with U.S. market access commitments in the WTO Agreement"); *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Satellites Providing Domestic and International Service in the United States,* 12 FCC Rcd. 24094, 24104(1997) ("*DISCO II*") (recognizing the US commitment "to provide market access to all basic telecommunications services and national treatment to service suppliers of WTO members").

[15] MSV Petition at 12.

services to its customers using the Inmarsat 4F2. The Bureau must reject MSV's request. Indeed, as Inmarsat has pointed out, if the Bureau were to restrict operations over this disputed spectrum, it would be tantamount to the reinstatement and modification of the expired 1999 L-band spectrum coordination agreement.[16] However, this is not the forum to adopt a new coordination agreement and policy for the L-band.

The Inmarsat D+ METs in the Satamatics Application should be free to use all of the L-band frequencies used by Inmarsat, subject to the outcome of any international coordination. If MSV has a dispute over the current distribution and coordination of L-band spectrum, it should bring this dispute with Inmarsat in accordance with the agreed-upon procedures for international coordination, not in this application proceeding.[17]

Despite MSV's suggestion otherwise, the Commission has not previously limited operators to the spectrum last coordinated for their use under an expired coordination agreement.[18] The 2001 *Inmarsat Market Access Order* is clear: "In the absence of a continuing annual L-band operator-to-operator coordination agreement, operations of METs in the 1525-1559 and 1626.5-1660.5 MHz bands will be on a non-interference basis until a future operator-to-operator agreement is concluded."[19] Subject to a non-harmful interference condition, the Commission has consistently held that MSV, TMI, and others could use the entire range of L-

---

[16] *See* Opposition of Inmarsat at 9-10, filed in File Nos. SES-LFS-20050930-01352, SES-AMD-20051111-01564, and ITC-214-20051005-00395 (Dec. 7, 2005) ("Inmarsat Opposition").

[17] Despite what MSV may imply, the Bureau acknowledges in the *MSV 63.5° W.L. Order* and *MSV 101° W.L. Order* that "informal" arrangements now govern the coordination of L-band spectrum, not the 1999 coordination agreement. *See MSV 63.5° W.L. Order* at ¶ 23; *MSV 101° W.L. Order* at ¶ 34.

[18] *See* MSV Petition at 13.

[19] *Inmarsat Market Access Order*, 16 FCC Rcd. at 21712-13.

band frequencies in the absence of a coordination agreement.[20] There is no reason to treat Satamatics differently now. If international coordination changes the spectrum available to Inmarsat, Satamatics will modify the operations of its METs accordingly. Until that time, however, there is no reason to delay approval of these applications.

The Bureau should not permit MSV to restrict the use of L-band spectrum in order to facilitate its plans to offer ancillary terrestrial component ("ATC") services. The Commission's Rules specify that ATC operations in the L-band are only permitted in bands which have been coordinated for satellite use.[21] However, the last formal coordination agreement under the Mexico City MOU expired in 1999. Further, in permitting ATC authority for the L-band, the Commission made it clear (and MSV agreed) that a provider could not seek to coordinate spectrum for ATC, as opposed to satellite service needs.[22] The Bureau must not allow MSV to manipulate spectrum assignments in order to further its goals for ATC.

### D. Grant of the Satamatics Application Will Not Create Any Technical Interference Issues

The existing Inmarsat D+ service has been provided with the current Inmarsat satellite for several years without causing harmful interference, and Satamatics and Inmarsat do not expect any increase in interference when these services are provided using the Inmarsat

---

[20] *See MSV 101° W.L. Order* at ¶ 34; *See MSV 63.5° W.L. Order* at ¶ 23; *Inmarsat Market Access Order*, 16 FCC Rcd. at 21712; *TMI Market Access Order*, 14 FCC Rcd. at 20814.

[21] *See* C.F.R. §25.253(a)(4)("In a band segment in which the applicant has no rights under a coordination agreement, the applicant may not implement ATC in that band.")

[22] *See Flexibility for Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band, the L-band, and the 1.6/2.4 GHz Bands*, 18 FCC Rcd. 1962, 2066-67 (2003) ("[W]e agree with MSV's assertion that parties could not legitimately identify terrestrial ATC usage to justify a larger MSS satellite spectrum assignment.")

4F2.[23] MSV's claims regarding possible interference due to technical differences between the Inmarsat 4F2 satellite and previous satellites do not support holding the Satamatics Application in abeyance. Indeed, the technical differences between the Inmarsat 4F2 satellite and earlier L-band satellites are unlikely to cause harmful interference in the L-band. First, MSV claims that the increased number of regional beams employed by the Inmarsat 4F2 satellite could cause harmful interference in the L-band.[24] However, as set forth in the Technical Appendix of the Satamatics Application and as explained by Inmarsat elsewhere, the Inmarsat 4F2 is more "interference friendly" than the third generation satellite because: (1) its narrower spot beams with steeper antenna side lobes reduce interference to adjacent areas; and (2) its higher gain spot beams allow the use of terminals that radiate less than one-tenth the power of existing Inmarsat high speed data terminals.[25] Further, the Inmarsat 4F2 satellite will be located 1.25° further away from MSV. This increased separation will further reduce any interference risk. In the absence of the coordination agreement, the Inmarsat 4F2 is capable of operating on a non-harmful interference basis.

MSV suggests that in the absence of a coordination agreement the "significantly larger aggregate EIRP ("AEIRP") of Inmarsat 4F2 relative to Inmarsat-3, could cause harmful intersystem interference. . . ."[26] This claim is also unavailing because the EIRP spectral density of the currently authorized services will be no greater than the EIRP spectral density of those

---

[23] As the Bureau has recognized, current L-band operators have been operating "interference-free" for some time. *See MSV 63.5° W.L. Order* at ¶ 23 ("While the most recent annual operator-to-operator agreement has not been renewed since 1999, the five parties have continued to coordinate their operations informally and have been operating interference-free."); *MSV 101° W.L. Order* at ¶ 34.

[24] *See* MSV Petition at 14-15.

[25] *See* Imarsat Opposition at 21-22.

[26] MSV Petition at 14.

same services provided today on the Inmarsat-3 satellite, which will allow Inmarsat to operate the Inmarsat 4F2 satellite within technical envelope of the last coordination agreement with MSV.[27]

Finally, MSV argues that "Inmarsat itself may suffer greater interference upon operation of its new satellite to support existing services" because of the higher antenna gain of the Inmarsat 4F2.[28] This claim is also not valid. As set forth in the Technical Appendix of the Satamatics Application and as explained by Inmarsat elsewhere, the global beam on the Inmarsat 4F2 satellite has same receive sensitivity as the global beam on the Inmarsat-3 satellite. Further, the regional and narrow spot beams on the Inmarsat 4F2 satellite have better receive performance and better side-lobe roll-off than the Inmarsat-3 satellite.[29] Inmarsat has taken these factors into account and is confident that it can operate Inmarsat 4F2, so that it is no more susceptible to interference than Inmarsat-3.[30]

### E. The Inmarsat 4F2 Satellite Is Properly Regarded As A Replacement Satellite

Despite what MSV may argue, the Inmarsat 4F2 satellite is properly regarded as a replacement satellite.[31] Through the Inmarsat 3 satellite at 54° W.L., Satamatics currently is able to serve the continental U.S., Puerto Rico and the U.S. Virgin Islands. Although 1.25° further east, the Inmarsat 4F2 at 52.75° W.L. will also serve the continental U.S., Puerto Rico and the U.S. Virgin Islands, as well as operate over the same L-band service link frequencies that are authorized for use on the Inmarsat 3 satellite at 54° W.L. Despite what MSV may imply,

---

[27] *See* Inmarsat Opposition at 22.

[28] MSV Petition at 16.

[29] *See* Inmarsat Opposition at 22.

[30] *See id.*

[31] *See* MSV Petition at 19.

Satamatics does not seek FCC authority to use Inmarsat METs in conjunction with the Inmarsat 4F2 satellite in any regions of the U.S. which are not presently served by the Inmarsat 3 satellite. Accordingly, the proposed use of the Inmarsat 4F2 satellite can be considered a replacement satellite. This was precisely the Bureau's treatment of MSV's satellite application at 101° W.L. -- the Inmarsat 4F2 satellite should not be treated any differently.[32] In fact, MSV's satellite at 101° W.L. increased its geographic coverage area from the satellite it replaced by adding parts of South America, but it was still regarded as a replacement satellite by the Bureau.[33]

### F. The Commission's FSS Station Keeping Rule Does Not Apply to MSS Satellites

The MSV Petition states that it is not clearly "settled" whether the Commission's Rule, 47 C.F.R. § 25.210(j), requiring FSS satellites to operate with +/- 0.05° East-West station keeping applies to MSS satellites.[34] However, the Commission's Rule and subsequent decisions are very clear -- Section 25.210(j) does not apply to MSS satellites. The Commission stated in its 2004 decision concerning the mitigation of orbital debris: "We decline, at this time, to adopt changes to Section 25.210(j) to specify a longitudinal tolerance of +/-0.05° for all space stations,

---

[32] *See MSV 101° W.L. Order* at ¶¶ 13-14.

[33] *Compare MSV 101° W.L. Order* at ¶ 1 ("The satellite will provide MSS on a common carrier basis within the United States, and between the United States and North America, Central America, the northern part of South America, and the Caribbean.") *with Amendment of Parts 2, 22, 25 of the Commission's Rules to Allocate Spectrum for and to Establish Rules and Policies Pertaining to the Use of Frequencies in a Land Mobile Satellite Service for the Provision of Various Common Carrier Services*, Memorandum Opinion and Order and Authorization, 4 FCC Rcd. 6041, 6053 (1989) ("The proposed beam coverage areas for the MSS network include the continental United States (CONUS), Alaska, Hawaii, Puerto Rico, Virgin Islands, Canada, parts of Mexico and Central America, including the Gulf of Mexico, and U.S. coastal areas up to 200 miles off-shore.").

[34] *See* MSV Petition at 20.

including MSS and remote sensing space stations."[35] Indeed, in filing a Petition for Clarification or Partial Reconsideration of its 101° W.L. authorization, MSV acknowledged that "there is no rule requiring MSS satellites to operate with a +/- 0.05° East-West station keeping box."[36] Section 25.210(j) is not applicable to the Inmarsat 4F2 satellite, and accordingly, a waiver of this rule by Satamatics is not required for the Satamatics Application.[37]

---

[35] *In the Matter of Mitigation of Orbital Debris*, 19 FCC Rcd. 11567, 11586 (2004).

[36] MSV Petition for Clarification or Partial Reconsideration, filed in File No. SAT-LOA-19980702-00066 et al. (June 22, 2005). This is not an unsettled point of law as MSV argues. As the MSV Petition for Clarification or Partial Reconsideration makes clear, MSV's own request for a waiver of Section 25.210(j) for its replacement satellite at 101° W.L. (and its new satellite at 63.5° W.L.) was filed because when those applications were filed there was a proposal to apply 25.210(j) to MSS. *See id.* at 2. However, as the 2004 Orbital Debris Mitigation Order makes clear, this proposal to modify 25.210(j) was never adopted by the Commission.

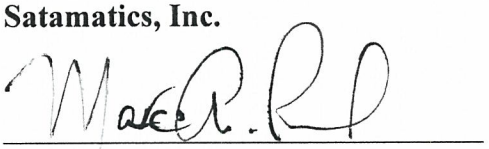
[37] If Section 25.210(j) were applicable to MSS, which it is not, the Inmarsat 4F2 satellite would be in a better position than MSV to receive such a waiver. Unlike the orbital positions where MSV is authorized to operate, the 52.75° W.L. orbital location for the Inmarsat 4F2 is not nearly as congested, thereby mitigating the need for a strict station keeping rule with a longitudinal tolerance of +/-0.05°. *See MSV 63.5° W.L. Order* at ¶ 12; *MSV 101° W.L. Order* at ¶¶ 20-21.

## III. CONCLUSION

For the reasons stated above, Satamatics respectfully requests that the Bureau dismiss or deny the MSV Petition and promptly grant the Satamatics Application as set forth therein.

Respectfully submitted,

**Satamatics, Inc.**



Alfred M. Mamlet
Marc A. Paul
Brendan Kasper
**Steptoe & Johnson LLP**
1330 Connecticut Avenue, NW
Washington, D.C. 20036
(202) 429-3000

*Counsel for Satamatic, Inc.*

February 9, 2006

## CERTIFICATE OF SERVICE

I, Marc A. Paul, an attorney with the law firm of Steptoe & Johnson LLP, hereby certify that on this 9th day of February, 2006, 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

Cassandra Thomas*
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

Stephen Duall*
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

Andrea Kelly*
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

Karl Kensinger*
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

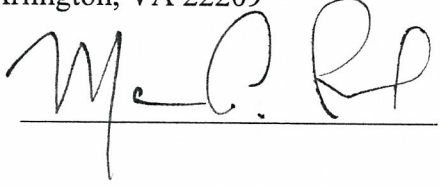
Jennifer A. Manner
Vice President, Regulatory Affairs
Mobile Satellite Ventures Subsidiary LLC
1002 Park Ridge Boulevard
Reston, Virginia 20191

Bruce D. Jacobs
David S. Konczal
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, N.W.
Washington, DC 20037-1128

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

John P. Janka
Jeffrey A. Marks
Latham & Watkins LLP
555 Eleventh Street, N.W., Suite 1000
Washington, D.C. 20004

Diane J. Cornell
Vice President, Government Affairs
Inmarsat, Inc.
1100 Wilson Blvd, Suite 1425
Arlington, VA 22209



* by Hand Delivery

**Scott Kotler***
**International Bureau**
**Room 6-C407**
**Federal Communications Commission**
**445 12th Street, S.W.**
**Washington, DC 20554**