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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

APR - 6 2006

Federal Communications Commission
Office of Secretary

In the matter of

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Telenor Satellite, Inc.

)

) File No. SES-MFS-20060130-00172

OPPOSITION OF INMARSAT VENTURES LIMITED

Inmarsat Ventures Limited (“Inmarsat”) opposes the Petition to Hold in Abeyance (“Petition”) of Mobile Satellite Ventures Subsidiary LLC (“MSV”). This proceeding involves a request by Telenor Satellite, Inc. (“Telenor”) for license modifications to permit the provision of already-authorized Inmarsat services using a new point of communication – the Inmarsat-3 satellite at 142° W.L. (“I-3”). I-3 has replaced the Inmarsat-2 (“I-2”) spacecraft previously operating at 142° W.L., which was running out of station-keeping fuel.

No one opposes the grant of Telenor’s application. However, as with every other earth station application filed since August 2005 that seeks authority to communicate with the Inmarsat satellite network, MSV seeks to delay Commission grant.¹ Specifically, MSV asks that the Commission not grant this application until Inmarsat coordinates the operation of I-3 with MSV and with the Canadian satellite system licensed to MSV Canada. MSV specifically requests that Inmarsat coordinate use of the 1545.8-1548 MHz band segment, portions of which

¹ Inmarsat disagrees with MSV’s characterization (*see* Petition at 2-3) regarding the ongoing L-Band spectrum dispute between Inmarsat and MSV. Inmarsat has fully briefed this issue in prior pleadings and incorporates by reference a recent pleading that summarizes Inmarsat’s positions on these issues. *See* Opposition of Inmarsat, File No. SES-MFS-20060118-00050, *et al.* (filed Mar. 16, 2006) (with Consolidated Opposition of Inmarsat, File No. File No. SES-MFS-20051207-01709, *et al.* (filed Feb. 2, 2006) attached thereto as Exhibit A).

MSV asserts are not currently available for Inmarsat's use. There is no basis to delay grant of authority as MSV requests.

As an initial matter, there is no dispute about the 1545.8-1548 MHz band. Different portions of this band segment are currently used today by Inmarsat and by MSV, without any known interference problems. Moreover, Telenor is today clarifying that it does not seek authority to use the portions of this band segment being used by MSV.

With regard to the 142° W.L. location, MSV ignores the fact that Inmarsat successfully operated its I-2 spacecraft at that location for over four years. Moreover, in the absence of a new spectrum sharing agreement under the Mexico City MoU, Inmarsat intends to employ on I-3 the very same L-Band frequencies that Inmarsat has been using for years to serve the United States. Thus, Telenor's request for authority to communicate with I-3 cannot be expected to have any adverse interference effect on MSV, and MSV presents no technical evidence to the contrary.

Furthermore, grant of this application is fully consistent with the recent grant of MSV's application to operate a new and uncoordinated L-Band MSS spacecraft at 63.5° W.L.² That application was granted just last year without any obligation being imposed on MSV to effectuate coordination with Inmarsat prior to launching or operating MSV's spacecraft. Here (as the Commission found in MSV's case)³ no other L-Band system in the vicinity of the United States could use the L-Band spectrum currently used by Inmarsat to serve the United States. Thus, the replacement of I-2 at 142° W.L. with I-3 will have no adverse interference effect on MSV.

² *Mobile Satellite Ventures Subsidiary LLC, Application for Authority to Launch and Operate an L-band Mobile Satellite Service Satellite at 63.5° W.L.*, 20 FCC Rcd 479 (2005).

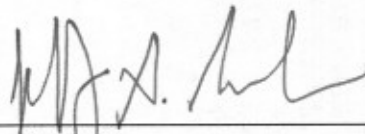
³ *Id.* ¶ 8.

Moreover, contrary to what MSV implies, Inmarsat has repeatedly attempted to coordinate its North American fleet operations with MSV, but MSV has rebuffed those efforts citing "other" business issues that MSV wishes to address prior to continuing such a dialogue.⁴ Fortunately, ITU Radio Regulations do not provide MSV with the right to veto Inmarsat's need to replace a dying satellite with one that will operate in a technically consistent manner.⁵

* * *

For the foregoing reasons, the Commission should deny MSV's Petition and grant Telenor's application without any conditions, other than requiring that, in the absence of a new spectrum sharing agreement, service be provided on a non-harmful interference basis.

Respectfully submitted,



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⁴ See Inmarsat Consolidated Response, File No. SES-STA-20051216-01756 *et al.*, at 9-11 (Jan. 6, 2006).

⁵ ITU Radio Regulation, Appendix 5 (Rev. WRC-03), AP-5-2 at ¶ 6(b)(c) (no further coordination required (i) when the technical characteristics of a new or modified frequency assignment are within the limits of those of a frequency assignment which has previously been coordinated; or (ii) when the characteristics of an existing assignment are changed in such a way as not to increase interference to or from, as appropriate, the assignments of other administrations).

CERTIFICATE OF SERVICE

I, Jeffrey A. Marks, hereby certify that on this 6th day of April, 2006, I caused to be served a true copy of the foregoing "Opposition of Inmarsat Ventures Limited," by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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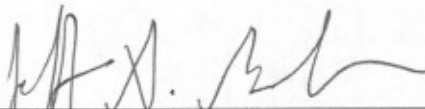
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