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Via Hand Delivery

December 14, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Applications of Mobile Satellite Ventures Subsidiary LLC for Modified ATC Authority, SAT-MOD-20051104-00212; SAT-MOD-20051104-00211; SES-MOD-20051110-01561

Dear Ms. Dortch:

Inmarsat Ventures Limited intends to participate in these proceedings, and is writing to request that the Commission consolidate the pleading cycle for these three applications to avoid the need to make redundant filings, to conserve Commission resources, and to provide administrative efficiencies. As it stands, there will be two different pleading deadlines on applications raising the same issues.

These three applications seek modified authority to provide ATC over (i) MSV's current generation spacecraft, (ii) MSV's next-generation spacecraft, and (iii) the Canadian-licensed TMI spacecraft whose capacity MSV markets. MSV itself acknowledges the interrelated nature of these applications, as MSV itself has sought consolidated treatment of all three applications. *See* Item 43 on MSV's Form 312 applications. Indeed, the technical aspects of these ATC applications appear virtually identical.

Public Notice of the two applications that involve MSV's own spacecraft, SAT-MOD-20051104-00212 and SAT-MOD-20051104-00211, occurred last Wednesday (*See* SAT-00333), setting a pleading deadline of January 6, 2006. The Commission has not yet placed on public notice the third application ----MSV's request for modified earth station authority to provide ATC over the Canadian-licensed TMI spacecraft, File No. SES-MOD-20051110-01561. Thus, the pleading deadline for the third application will be no sooner than January 13, 2006.

In order to provide the full thirty (30) days specified in the Section 25.154 of the Commission's rules for commenting on MSV's third ATC application, to avoid the need for redundant filings, to conserve Commission resources, and to provide administrative efficiencies, Inmarsat respectfully requests that the Commission establish a single deadline for commenting

on all three of these ATC applications, with the initial pleading deadline calculated from the forthcoming public notice accepting for filing File No. SES-MOD-20051110-01561.

This consolidation request is consistent with Commission rules and precedent. Section 1.227 of the Commission's rules provides for consolidation where "such action will best conduce to the proper dispatch of business and to the ends of justice" in cases that involve the same applicant or substantially the same issues. That is the case here. *See also Nextel License Holdings 4, Inc. and Nextel WIP License Corp.*, 17 FCC Rcd 7028 (2002) (consolidating processing of similar petitions to deny and thereby aligning opposition due dates). Consolidating the upcoming pleading cycle also would be consistent with MSV's request for consolidated processing of these applications, while still affording the full thirty-day period specified in the Commission's Rules for filing comments on each ATC application. Moreover, as OET has recognized in a related context, the filing of a single submission by Inmarsat would facilitate full, efficient, and timely consideration of the issues. *See DA 05-3177* (rel. Dec. 12, 2005) (encouraging joint submissions of pleadings related to a spectrum dispute between MSV and Inmarsat regarding the L-Band).

In sum, Inmarsat submits that grant of this consolidation request will reduce the volume of filings and increase the efficient processing of these applications, while providing only a very brief delay of filings otherwise due on January 6, 2006.

Respectfully submitted,


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