

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
TerreStar Networks, Inc.)	File No. SES-MOD-
Application for Modification of 2 GHz Band-)	20100727-00963
Mobile Earth Terminal Blanket License)	
(Call Sign E060430))	
)	

COMMENTS OF NEW DBSD SATELLITE SERVICES G.P.

New DBSD Satellite Services GP, Debtor-in-Possession (“DBSD”) submits these comments in support of the above-captioned application of TerreStar Networks, Inc. (“TerreStar”) for modification of its Ancillary Terrestrial Component (“ATC”) authority.

In its application, TerreStar seeks ATC rule waivers identical to those granted to DBSD under its ATC authorization.¹ The waiver requests seek relief from ATC technical rules that originally were designed to protect an aeronautical mobile satellite service that later was abandoned. These rules therefore are more restrictive than is necessary and should be waived to allow for more efficient use of the 2 GHz band.

TerreStar asserts that the waivers will enable TerreStar to enhance network efficiency and that the waivers closely track waivers granted to DBSD, the only other 2 GHz band MSS/ATC licensee. TerreStar also agrees to be subject to the same conditions imposed on DBSD, including the two conditions the Commission attached to DBSD’s waiver of Section

¹ See *New ICO Satellite Services G.P.*, Order and Authorization, 24 FCC Rcd 171 (IB 2009) (“DBSD Order”).

25.252(a)(1), *i.e.*, that the waiver will be subject to the outcome of pending proceedings concerning adjacent-band AWS services² and that it will not apply to operation of any base station located within 133 kilometers of a U.S. government earth station receiving in the 2200-2290 MHz band.³

DBSD supports TerreStar's request for relief from overly-restrictive technical requirements. DBSD agrees that relief from these rules, especially in a manner that enables the greater harmonization of ATC operations in the 2 GHz band, will lead to more efficient deployment of services and will serve the public interest.

Respectfully Submitted,

/s/ Peter A. Corea

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² DBSD Order, ¶ 44.

³ DBSD Order, n. 105. DBSD takes no position on TerreStar's commitment to coordinate with the National Telecommunications and Information Administration as necessary in connection with the operation of its base stations in proximity with U.S. government earth stations.