

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

In the Matter of)
)
The Boeing Company) File No. SES-MOD-20120403-00326
)
Application for Modification)
of Earth Station License)

PETITION TO DISMISS OF IRIDIUM SATELLITE LLC

Iridium Satellite LLC (“Iridium”) hereby petitions to dismiss the above-captioned application filed by The Boeing Company (“Boeing”).

In its application, Boeing seeks to modify its license for satellite earth station E100106 to add ALSAT and EchoStar 9 as points of communication. The frequencies Boeing proposes to use to communicate with ALSAT and EchoStar 9 include the 29.25-29.3 GHz band. Iridium demonstrates below that Boeing’s application is incomplete because it does not address the potential for Boeing to cause unacceptable interference to Iridium’s non-geostationary satellite orbit (“NGSO”) feeder links and TT&C links in the 29.25-29.3 GHz band.

DISCUSSION

I. INTEREST OF IRIDIUM

Iridium operates a constellation of 66 NGSO mobile satellite service (“MSS”) space stations in low earth orbit. Through its satellite constellation, the largest in the world, Iridium is able to deliver communication services to first responders, public safety personnel, the U.S. Department of Defense, border security officers, the aviation industry, and the energy sector in addition to providing essential backup communications across urban and rural areas alike.

Every user communication on the Iridium satellite system is routed through a gateway earth station. Iridium’s gateways operate on feeder link frequencies that include the 29.25 -29.3 GHz band Boeing proposes to use. Iridium also employs this band for the uplink portion of the TT&C links it uses to control and command its space stations. Iridium’s feeder links and TT&C links in the 29.25-29.3 GHz band are co-primary with Boeing’s proposed operations in the band.

II. BOEING DOES NOT TAKE INTO ACCOUNT THE POTENTIAL FOR CAUSING UNACCEPTABLE INTERFERENCE TO IRIDIUM

Section 25.203(k) of the Commission’s rules requires Ka-band earth station applicants such as Boeing to show that: (1) they will not cause unacceptable interference to co-channel MSS feeder link earth stations; or (2) their operations will be consistent with the coordination agreements of the operators of the space stations at issue. Boeing does not satisfy either element of this test.

First, Boeing did not, and could not, show compliance with a coordination agreement with Iridium. The parties have not entered into a coordination agreement, and Boeing has not even attempted to coordinate its earth station.

Second, Boeing has not shown that it can avoid causing unacceptable interference to Iridium. In fact, Boeing's above-captioned application makes no mention of Section 25.203(k) and is silent as to whether unacceptable interference will occur.

CONCLUSION

Boeing proposes to operate on frequencies that include the 29.25-29.3 GHz band. Iridium already employs this band on a primary basis for feeder links and for the uplink portion of the TT&C links it uses to control and command its space stations. The rules require Boeing to show that it will not cause unacceptable interference to Iridium; Boeing did not make this showing. Accordingly, Boeing's application is incomplete, and for the reasons stated herein the application should be dismissed.

Respectfully submitted,

IRIDIUM SATELLITE LLC

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **PETITION TO DISMISS OF IRIDIUM SATELLITE LLC** was sent by first class mail, postage prepaid, this 15th day of June, 2012, to each of the following:

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/s/ Jennifer Tisdale
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