



November 10, 2014

FILED ELECTRONICALLY

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

Re: File Nos. SES-MOD-20130416-00323 and SES-MOD-20130416-00322
Applications of Iridium Satellite LLC and Iridium Carrier Services LLC
for blanket earth station AMS(R)S authority

Dear Ms. Dortch:

In the above-referenced applications, Iridium Satellite LLC and Iridium Carrier Services LLC (collectively, "Iridium") are seeking blanket earth station license modifications that would authorize using earth stations on aircraft to provide AMS(R)S. Iridium hereby clarifies certain elements of its applications.

Terminal types for which AMS(R)S authority is sought. Each of Iridium's blanket earth station licenses (E960132 and E960622) identifies three antenna types. Iridium seeks AMS(R)S authority only for the first antenna type shown in each license.

Areas within which AMS(R)S will be provided: Iridium's request for AMS(R)S authority is limited, both within the United States and outside the United States, to oceanic, polar, and remote regions.

Providing AMS(R)S only within authorized areas: The aeronautical systems on aircraft that are equipped with Iridium's AMS(R)S terminals are designed to attempt communication first with the terrestrial network. The aeronautical



systems will not attempt to communicate with Iridium's satellite network unless contact cannot be made with the terrestrial network.

Obtaining authority from relevant airspace administrators. Iridium has been securing AMS(R)S authority on a country-by-country basis from relevant airspace administrators. Iridium already has AMS(R)S authority from the Federal Aviation Administration, which is the airspace administrator for the United States, and from all other airspace administrators that, together with the FAA, have jurisdiction over all oceanic, polar, and remote regions in which Iridium currently has plans for providing AMS(R)S.

Implementation of priority and preemption. Each Iridium terminal that will be used to provide AMS(R)S has an identifier that enables Iridium's network to identify the terminal as supporting AMS(R)S transmissions and to provide appropriate levels of priority and preemption for the transmissions.

Please direct any questions concerning this matter to the undersigned.

Sincerely,

/s/Donna Bethea Murphy
Vice President, Regulatory
Engineering

cc: Karl Kensinger
Paul Blais
Hsing Liu

