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May 2, 2008

**BY HAND**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
c/o Natek, Inc.  
236 Massachusetts Avenue, NE, Suite 110  
Washington, DC 20002

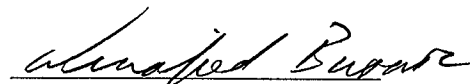
Re: Comtech Mobile Datacom Corporation  
Comments on the Inmarsat, Inc. Petition for Declaratory Ruling  
IB Docket No. SES-PDR-20080303-00367

Dear Ms. Dortch :

Comtech Mobile Datacom Corporation, by its attorney, hereby submits an original and four copies of its comments on the Inmarsat, Inc. Petition for Declaratory Ruling for inclusion in the above-referenced docket.

Please date-stamp the duplicate copy of this letter and return it to the bearer. Please direct any questions as to this matter to the undersigned counsel.

Respectfully submitted,



Winfred Brantl\*

Its Attorney

Enclosure

\* Not admitted in DC

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

<b>In the Matter of</b>	)	
	)	
<b>Request to Streamline Licensing Of L-band User Terminals Using Inmarsat Satellites as Points Of Communication</b>	)	<b>SES-PDR-20080303-00367</b>
	)	
	)	

**COMMENTS OF  
COMTECH MOBILE DATACOM CORPORATION**

Comtech Mobile Datacom Corporation ("CMDC") hereby submits these Comments on the Petition of Inmarsat, Inc. ("Inmarsat") for a declaratory ruling concerning the licensing of user terminals that communicate with Inmarsat satellites operating in the L-band ("Petition"). In its Petition, Inmarsat proposes that the Commission grant authority to user terminal licensees to communicate with any and all Inmarsat satellites approved for U.S. service ("ISAT") by allowing licensees to specify ISAT as a point of communication in their license applications. CMDC holds a blanket mobile earth station license authorizing it to operate 25,000 L-band user terminals on MSAT-1 and MSAT-2 (E990143) and has recently submitted a request for special temporary authority to operate on Inmarsat 4F2 (File No. SES-STA-20080425-00490). As such, CMDC has a direct interest in this proceeding.

CMDC supports Inmarsat's request and urges the Commission to grant the Petition. In effect, Inmarsat is asking the Commission to establish an L-band variation of "ALSAT" and the "Permitted Space Station List." The "Permitted Space Station List" is the Commission's list of satellites with which all U.S.-licensed C-band and Ku-band earth stations with routinely authorized technical parameters are permitted to communicate without additional Commission

action. Any C-band or Ku-band earth station with a U.S. license showing "ALSAT" as a point of communication can communicate with any of the satellites on the Permitted Space Station List, provided that the earth station complies with the Commission's technical requirements and operates under the conditions that appear on its license or in any orders applicable to the satellite in question.<sup>1</sup> This mechanism for facilitating earth station access to new or relocated C- and Ku-band satellites has evolved over time to reflect changes in the FCC's policies on earth station and satellite operation.<sup>2</sup> However, the underlying public interest rationale has remained the same. As the Commission has recognized, streamlining the process whereby earth station operators gain access to new or relocated C- and Ku-band spacecraft can stimulate competition in the U.S. by reducing operator costs and giving consumers more alternatives in choosing communications providers and services.<sup>3</sup>

CMDC submits that allowing L-band user terminal licensees to specify ISAT as the point of communication in their license applications, thereby permitting those licensees to access multiple L-band satellites, should result in the same public interest benefits as use of the ALSAT designation and the Permitted Space Station List in the C- and Ku-bands. Modifying an L-band user terminal license every time a new satellite is placed into service or an existing satellite is relocated is a time-consuming and costly process for licensees as well as for the Commission.

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<sup>1</sup> See *Satelites Mexicanos, S.A. de C.V.*, 15 FCC Rcd 19311 (2000) ("*Satelites Mexicanos*"); *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, IB Docket No. 96-111, First Order on Reconsideration, 15 FCC Rcd 7207, ¶¶ 13-20 (1999) ("*DISCO II First Reconsideration Order*").

<sup>2</sup> See, e.g., *DISCO II First Reconsideration Order* at ¶¶ 13-20 (earth stations with ALSAT designation permitted to access non-U.S.-licensed satellites placed on the Permitted Space Station List, as well as U.S.-licensed satellites); *Amendment to the Commission's Regulatory Policies Governing Domestic Fixed Satellites and Separate International Satellite Systems and DBSC Petition for Declaratory Ruling Regarding the use of Transponders to Provide International Service*, 11 FCC Rcd 2429, ¶ 52 (1996) (earth stations with ALSAT designation permitted to access U.S.-licensed international satellites as well as U.S.-licensed domestic satellites).


<sup>3</sup> See *Satelites Mexicanos* at ¶ 1; *DISCO II First Reconsideration Order* at ¶ 15.

Creating a mechanism to allow a user terminal licensee to communicate with approved L-band satellites without the need to file license modifications to cover each spacecraft would minimize regulatory delay and conserve Commission and licensee resources, thereby promoting competition and its attendant benefits for the public.

The Commission has made great progress in recent years streamlining the earth station license application process for C-band and Ku-band earth station licenses, thereby minimizing the costs and burdens for the FCC as well as for licensees. CMDC submits that the license application process for L-band user terminals would benefit from similar modifications. Establishing a mechanism for facilitating access to multiple L-band satellites as proposed by Inmarsat would be a good first step in streamlining the application process. Accordingly, CMDC urges the Commission to grant Inmarsat's petition.

Respectfully submitted,

**COMTECH MOBILE DATACOM CORPORATION**

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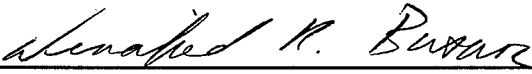
Its Attorney

May 2, 2008

**CERTIFICATE OF SERVICE**

I, Winafred R. Brantl, do hereby certify that on this 2<sup>nd</sup> day of May 2008, a copy of the foregoing *Comments of Comtech Mobile Datacom Corporation* was served via email on the following party:

Diane J. Cornell  
Vice President, Government Affairs  
INMARSAT, INC.  
1101 Connecticut Avenue, NW  
Suite 1200  
Washington, DC 20036

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Winafred R. Brantl