

ORIGINAL FILED/ACCEPTED

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

MAY - 5 2008

Federal Communications Commission  
Office of the Secretary

In the Matter of )  
)  
Request to Streamline Licensing of L-band )  
User Terminals Using Inmarsat Satellite as )  
Points of Communication )

File No. SES-PDR-20080303-00367

**MVS FED, LLC COMMENTS IN SUPPORT OF PETITION**

MVS Fed, LLC (“MVS”), by its attorneys, hereby submits short comments in support of the Petition for Declaratory Ruling filed by Inmarsat, Inc. (“Inmarsat”) proposing that the International Bureau (the “Bureau”) make a ministerial change in how it specifies authorized points of communication in Inmarsat L-band user terminal licenses.<sup>1</sup>

MVS is an applicant for a Commission user terminal license for authority to communicate with Inmarsat spacecraft.<sup>2</sup> Currently, MVS must apply for individual authority for each Inmarsat user terminal to communicate with multiple Inmarsat spacecraft. Inmarsat’s proposal would permit applicants and licensees to seek authority to communicate with all Inmarsat spacecraft that have been approved for U.S. service in the L-band, by designating “ISAT” as the desired point of communication. The term “ISAT” would refer to all Inmarsat spacecraft that are contained on a list to be maintained by the Commission, and would

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<sup>1</sup> The L-band, as described in these Comments, refers to Inmarsat’s coordinated spectrum in the United States. The L-band encompasses frequencies from 1525-1544/1545-1559 MHz and 1626.5-1645.5/1646.5-1660 MHz. The frequencies 1525-1544 MHz and 1626.5-1645.5 MHz are referred to as the “lower L-band” and 1545-1559 MHz and 1646.5-1660.5 MHz are referred to as the “upper L-band.”

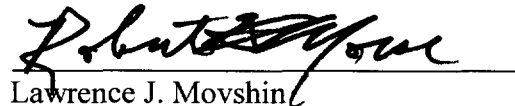
<sup>2</sup> See FCC File No. SES-LFS-20051123-01634; SES-AMD-20071221-01750, Call Sign E050348. MVS has separately applied for and obtained Special Temporary Authority in connection with this pending application. See *Satellite Communications Services Information Re: Actions Taken*, Report No. SES-00997, *Public Notice* (IB rel. Jan. 8, 2008) (File No. SES-STA-20071221-01751). MVS’s subsequent extension requests remain pending. See File No. SES-STA-20080304-00222; SES-STA-20080501-00519.

automatically provide authority to communicate with future Inmarsat L-band spacecraft once those spacecraft have been approved for U.S. service.

For the reasons stated by other commenting parties, MVS strongly supports Inmarsat's proposal and requests that the Commission create a list of all Inmarsat spacecraft that are approved to provide L-band service to the United States. In addition, MVS requests that the Bureau's grant of MVS's pending application for a license to communicate with Inmarsat spacecraft specify "ISAT" as the designated point of communication,<sup>3</sup> and allow applicants for and licensees of future user terminals to specify "ISAT" as the designated point of communication, thereby providing authority to communicate with all Inmarsat spacecraft that are approved from time to time to serve the United States.

Respectfully submitted,

**MVS FED, LLC**



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<sup>3</sup> This designation would be reflected in File No. SES-AMD-20071221-01750, and a copy of the instant filing is being submitted in that proceeding. *See* Public Notice, "International Bureau Satellite Engineering Branch Information: Revisions to Earth Station Licenses Authorized to Access INTELSAT," Report No. SPB-172 (IB rel. July 20, 2001) (modifying specified earth station licenses to provide domestic service using INTELSAT satellites without requiring that the earth station licensees file license modification requests).