

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com
ROBERT G. MORSE
202.383.3393
rmorse@wbklaw.com

ORIGINAL

May 2, 2008

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

FILED/ACCEPTED
MAY - 2 2008
Federal Communications Commission
Office of the Secretary

Attn: Robert Nelson, Chief
International Bureau, Satellite Division


Re: *iPass Inc.*
File No. SES-LIC-20070712-00933
Call Sign E070144

Dear Ms. Dortch:

The attached letter was filed in support of Inmarsat, Inc.'s petition for declaratory ruling in File No. SES-PDR-20080303-00367. Please include the attached letter in the above-referenced file, as it relates to issues raised in that application. An original and two copies are submitted.

WILKINSON BARKER KNAUER, LLP

By:


Robert G. Morse

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

FILED/ACCEPTED
MAY - 2 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

**IPASS, INC. COMMENTS IN SUPPORT OF
PETITION FOR DECLARATORY RULING**

iPass Inc. (“iPass”) hereby submits these 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.¹

iPass is an applicant for a Commission user terminal license for authority to communicate with Inmarsat spacecraft.² Currently, iPass 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

¹ 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.”

² See File No. SES-LIC-20070712-00933, Call Sign E070144. iPass has separately applied for and obtained Special Temporary Authority in connection with this pending application. See File Nos. SES-STA-209070716-00944, *extended* SES-STA-20080205-00121, *request for further extension pending* SES-STA-20080407-00430.

contained on a list to be maintained by the Commission, and would automatically provide authority to communicate with future Inmarsat L-band spacecraft once those spacecraft have been approved for U.S. service.

Because L-band user terminals are authorized to communicate with Inmarsat spacecraft today on a spacecraft-by-spacecraft and orbital-location-by-orbital-location basis, each time that Inmarsat launches or relocates a satellite to serve the United States, a licensee of earth terminals must seek authority for the new point of communication. The current process results in numerous, repetitive applications and modifications. Inmarsat's proposed streamlining approach would obviate the need for such duplicative filings.

Designating "ISAT" as a point of communication in L-band user terminal licenses that authorize service with Inmarsat satellites would provide significant public interest benefits and is consistent with Commission policy. Streamlining the licensing process would minimize regulatory delay, conserve Commission resources, and expedite service to the public. The Inmarsat proposal is consistent with Commission policy because it would not adversely affect the interference environment, applicants' obligation to make all required technical and regulatory showings would remain unchanged, and it is consistent with other procedural streamlining mechanisms the Commission has adopted for other satellite services.³

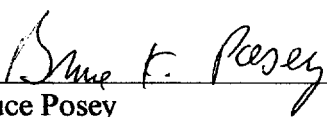
For the foregoing reasons, iPass strongly supports Inmarsat's proposal and requests that the Commission create a list of all Inmarsat spacecraft that are approved to provide L-band

³ *Intelsat North America, LLC, Application for Authority to Modify Earth Station Authorization to Provide Launch and Early Orbit Phase ("LEOP") operations for Newly Launched Satellites*, File Nos. SES-MOD-20050615-00751, SES-AMD-20051116-01587, Call Sign E040125, Order and Authorization, DA 06-2557, ¶ 14 (rel. Dec. 21, 2006); *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service*, First Order on Reconsideration, 15 FCC Rcd 7207, ¶ 16 (1999).

service to the United States. In addition, iPass requests that the Bureau's grant of iPass's pending application for a license to communicate with Inmarsat spacecraft specify "ISAT" as the designated point of communication,⁴ 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,

IPASS INC.



Bruce Posey
Senior Vice President, General Counsel and
Corporate Secretary
3800 Bridge Parkway
Redwood Shores, CA 94065
(650) 232-4100

May 2, 2008

⁴ This designation would be reflected in File No. SES-LIC-20070712-00933, 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).