

ORIGINAL

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

FILED/ACCEPTED
MAY - 1 2008
Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Request to Streamline Licensing of L-band) SES-PDR-20080303-00367
User Terminals Using Inmarsat Satellite as)
Points of Communication)

COMMENTS OF THRANE & THRANE AIRTIME LTD.

Thrane & Thrane Airtime Ltd. (“T&T Airtime”) 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 the way that it specifies authorized points of communication in Inmarsat L-band¹ user terminal licenses.

T&T Airtime is a Commission licensee with user terminal licenses with authority to communicate with Inmarsat spacecraft. Currently, T&T Airtime 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 automatically provide authority to communicate with future Inmarsat L-band spacecraft once those spacecraft have been approved for U.S. service.

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.”

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 procedural process results in numerous, repetitive applications and modifications. Inmarsat's proposed streamlining approach would obviate the need for such additional, 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 speed service to the public. The Inmarsat proposal is consistent with Commission policy because it would not adversely affect the interference environment, the 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.²

For the foregoing reasons, T&T Airtime respectfully submits its support of 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, T&T Airtime requests that the Commission modify T&T Airtime's existing licenses to communicate with Inmarsat

² *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 Rcd 7207 ¶ 16 (1999).

spacecraft to specify "ISAT" as the designated point of communication,³ 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,



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³ Call Sign E060179. See Public Notice, "International Bureau Satellite Engineering Branch Information: Revisions to Earth Station Licenses Authorized to Access INTELSAT," Report No. SPB-172 (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).

CERTIFICATE OF SERVICE

I, Eric Fishman, an attorney with the law firm of Holland & Knight LLP, hereby certify that on this 1st day of May, 2008, a true copy of the Comments of Thrane & Thrane Airtime Ltd. was served by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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