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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	File No. SES-STA-20051216-01756
	)	File No. SES-STA-20051216-01757
<b>TELENOR SATELLITE, INC.</b>	)	File No. SES-STA-20051216-01758
	)	File No. SES-STA-20051216-01759
	)	File No. SES-STA-20060118-00055
	)	File No. SES-STA-20060118-00056
	)	File No. SES-STA-20060118-00057
	)	File No. SES-STA-20060118-00058
For Special Temporary Authority to	)	File No. SES-STA-20060119-00064
Access the Inmarsat 4F2 Satellite	)	File No. ITC-STA-20060120-00031

To: International Bureau

**REPORT OF TELENOR SATELLITE, INC.**

Telenor Satellite, Inc. (“Telenor”) hereby submits this Report pursuant to the conditions imposed by the Bureau when it granted the above-captioned requests for special temporary authority on January 19, 2006.

The third condition imposed by the Bureau requires Telenor to submit a report addressing whether, given the increased capacity of the Inmarsat 4F2 relative to the Inmarsat 3F4 satellite, there would be any discontinuance of, or degradation of the reliability of, existing operations should access to the disputed spectrum be terminated. That issue will be addressed in a separate report by Inmarsat. As shown in that report, any loss of access to disputed spectrum would result in a substantial increase in the probability of call blockage, which would directly degrade the quality and reliability of the existing Inmarsat services offered by Telenor in the United States.

The condition also requires Telenor to submit a list of potentially affected end-users, including any U.S. government end-users, using Mobile Earth Terminals (METs) that may operate in the disputed spectrum or other affected spectrum under these STAs. That list is to include a point of contact (name and telephone number) for each such end-user, and the number of METs associated with each such end-user.

Telenor has done its best to obtain the customer information sought by the Bureau. However, Telenor cannot provide the exact information the Bureau has requested, for several reasons.

- First, as described in more detail in Inmarsat's submission, the Inmarsat system uses demand-assigned frequencies for most existing and evolved (E&E) services. The customers using disputed spectrum today may not be the ones using that spectrum tomorrow, and vice versa. Thus, all customers are "potentially affected" by the loss of that spectrum.
- Second, although Telenor does know how many METs each of its direct customers has, those terminals are, by definition, mobile. Thus, Telenor does not know which of those terminals is operating with the Inmarsat 4F2 (let alone on the disputed spectrum) at any given time.
- Third, while Telenor does bill some end users directly, it primarily uses a network of distributors who, for competitive reasons, do not share end-user contact information with Telenor. Thus, Telenor literally does not know who many of its end-users are.

For all these reasons, the closest Telenor could come to providing the information requested by the Bureau would be to submit a list of all its customers, including agents,

distributors and end users, and the number of terminals associated with each. Such a list would be created from Telenor's billing records and would include literally thousands of customers and tens of thousands of terminals. However, in Telenor's view, this information would be useless to the Bureau, again for several reasons.

- First, there would be no way to correlate this information to the use of the disputed spectrum on the Inmarsat 4F2.
- Second, the point of contact for a very large portion of the entries would be "Accounts Payable," because a typical customer may allow several individuals to use a particular terminal.
- Third, the information would actually be misleading, particularly with respect to U.S. government use, because many customers (particularly in the military services) obtain some services from Telenor directly and others through distributors. Thus, for example, the number of terminals listed for the U.S. Air Force would be smaller than the number of terminals the Air Force actually uses.

At the same time, this information is incredibly sensitive. It is in effect Telenor's customer list and thus perhaps the single most important trade secret that Telenor possesses. Telenor is extremely reluctant to disclose this information when there is any possibility of its being publicly disclosed, through inadvertence or otherwise. Accordingly, Telenor respectfully requests that it not be required to submit this information.

Telenor is, however, submitting other information that it believes is responsive and will be useful to the Bureau. For example, Telenor has direct contact with several U.S. government agencies, including several Cabinet departments and all branches of the armed services. Annex A identifies those agencies, along with a point of contact for each and the number of terminals

for which we bill each agency directly. (Again, most agencies also obtain service indirectly through one or more distributors. Thus, the number of terminals for which Telenor bills directly is usually much smaller than the number of terminals the agency actually uses.)

In addition, Annex B is a list of Telenor's agents and distributors. Here too, Telenor has listed a point of contact for each entity and the number of terminals associated with each, based on its billing records. The number of METs shown refers to total worldwide activations, not METs operating with the 4F2 satellite.

For competitive reasons, the information contained in Annexes A and B is highly confidential. Indeed, if anything, it is more sensitive than an unedited customer list would be, because it provides information as to Telenor's key customers in a format that is readily accessible. Accordingly, Telenor is submitting those annexes with a request for confidential treatment pursuant to Section 0.459 of the Commission's Rules. They have been redacted from the public version of this report, and we are filing the confidential version only with the Secretary's office.

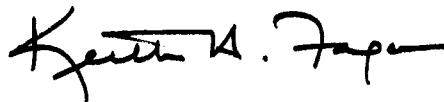
Telenor also has other information that, while not literally responsive to the Bureau's request, does provide further insight into the U.S. government's use of the Inmarsat system. Specifically, Telenor's business planning group has estimated the amount of Telenor revenue from Inmarsat service that is attributable to U.S. government usage, basically by combining the revenues derived from the government directly with those obtained from distributors that are primarily government contractors. That information indicates that government usage accounted for 67% of Telenor's total external revenue in 2005, and for 50% of the revenue generated from traffic routed through the Southbury earth station. Again, the information is not as granular as the Bureau might wish, because Southbury sees other satellites in addition to Inmarsat 4F2. In

Telenor's view, however, this data is the best evidence of the government's heavy reliance on Telenor's Inmarsat services.

In sum, for the reasons stated in this report and in Inmarsat's report, any loss of disputed spectrum would result in degraded service for all of Telenor's Inmarsat customers, and indeed all customers of the system.

Respectfully submitted,

**TELENOR SATELLITE, INC.**

A handwritten signature in black ink, appearing to read "Keith H. Fagan". The signature is written in a cursive style with a horizontal line at the end.

Keith H. Fagan  
Its Attorney

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February 17, 2006





## CERTIFICATE OF SERVICE

I, Keith H. Fagan, hereby certify that on this 17<sup>th</sup> day of February, 2006, I caused a true copy of the foregoing Report of Telenor Satellite, Inc. to be served by first class United States mail, postage prepaid, upon the following:

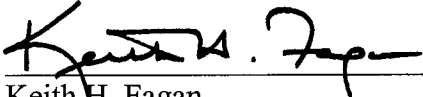
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