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Satellite Division
International Bureau

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)	
)	
Stratos Communications, Inc.)	SES-STA-20051216-01760 (E000180)
)	SES-STA-20051216-01761 (E010047)
)	SES-STA-20051216-01762 (E010048)
)	SES-STA-20051216-01763 (E010049)
)	SES-STA-20051216-01764 (E010050)
)	
SkyWave Mobile Communications, Corp.)	SES-STA-20051222-01788 (E030055)
)	
Satamatics, Inc.)	SES-STA-20051223-01790 (E020074)
)	

To: International Bureau

JOINT REPLY COMMENTS

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January 6, 2006

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JOINT REPLY COMMENTS

Stratos Communications, Inc. ("Stratos"), SkyWave Mobile Communications, Corp. ("SkyWave") and Satamatics, Inc. ("Satamatics") (collectively referred to as "Applicants") hereby submit these Joint Reply Comments in response to Mobile Satellite Ventures Subsidiary LLC's ("MSV's") Comments concerning the above-captioned requests for special temporary authority ("STA").¹ For the reasons set forth below, in the above-captioned STA requests and in the underlying modification applications filed by Applicants, the International Bureau ("the Bureau") should grant by January 13, 2006 the requested STAs to ensure that existing Inmarsat

¹ See MSV Comments (Dec. 28, 2005) ("MSV Comments"). Applicants note that the MSV Comments contain confidential material that has been withheld from Applicants. See MSV Comments at 2 n.4. In a related proceeding, Stratos filed a Motion to Strike such confidential material. See Motion to Strike filed in File Nos. SES-LFS-20050826-01175, SES-AMD-20050922-01313, ITC-214-20050826-00351 (Nov. 10, 2005). In the interests of streamlining the processing of these STA requests, Applicants have refrained from filing a similar Motion at this time, but reserve the right to do as necessary.

services being provided to a wide-range of U.S. military, U.S. government and private sector end-users are not disrupted.

I. INTRODUCTION AND SUMMARY

Stratos, SkyWave and Satamatics have filed applications to modify their existing authorizations to operate Inmarsat terminals to include the recently launched fourth-generation Inmarsat satellite to be located at 52.75° W.L. ("Inmarsat 4F2") as a point of communication.² Applicants are currently authorized to use a third generation Inmarsat satellite located at 54° W.L. to offer Inmarsat B, C, M, mini-M, M4 and D+ services to U.S. customers. Inmarsat is scheduled to migrate these services from that third generation satellite at 54° W.L. to the Inmarsat 4F2 at 52.75° W.L. on January 15, 2006.

Applicants have been informed by Inmarsat that this scheduled migration is critical because the third generation satellite at 54° W.L. needs to be moved to 142° W.L. where it will replace a second generation Inmarsat satellite, which is running out of fuel and must be decommissioned. Stratos, SkyWave and Satamatics filed STA requests in order to continue to provide existing and vital Inmarsat services to their customers while the Bureau considers the underlying modification applications.

Contrary to what MSV may imply in its Comments, sufficient detail on the Inmarsat services at issue in these STAs has been provided. Of course, these Inmarsat services are not new and are well-known to the Bureau. Stratos was authorized to provide these domestic Inmarsat services in 2001, Satamatics in 2003 and SkyWave in early 2004. To date, these services have been provided to customers without interference to or complaint from MSV. As

² See File Nos. SES-MFS-20051122-01614, SES-MFS-20051122-01615, SES-MFS-20051122-01616, SES-MFS-20051122-01617, SES-MFS-20051122-01618, SES-MFS-2005, SES-MFS-20051202-01665, and SES-MFS-20051207-01709.

set forth in the STA requests, the customers of Stratos, SkyWave and Satamatics rely heavily on the Inmarsat services to facilitate military communications, law enforcement, homeland security and to protect, track and monitor sensitive assets throughout the United States. Any disruption to these services would be devastating to these essential activities and clearly would not be in the public interest.

Despite what MSV may argue, Stratos, SkyWave and Satamatics have clearly indicated in their STAs (and provided substantial supporting technical detail in their underlying modification applications) that providing their existing Inmarsat services over the recently launched Inmarsat 4F2 satellite will be done within the same technical envelope (*e.g.*, no greater EIRP spectral density, no unauthorized out-of-band emissions, and no need for greater interference protection) as these services are provided today, and as a result, there will be no increased interference risk to MSV.³ MSV has provided no technical evidence to suggest otherwise.

MSV's Comments should be rejected by the Bureau as a transparent attempt to use the Applicant's STA requests (and their underlying modification applications) as leverage in its on-going spectrum dispute with Inmarsat. MSV's spectrum dispute, however, should be resolved through the agreed-upon mechanism for international coordination -- *i.e.*, the Mexico City Memorandum of Understanding ("Mexico City MOU") -- and not this proceeding. The Bureau should not allow MSV to treat Stratos, SkyWave and Satamatics as pawns in its dispute, especially when vital communications services are at risk.

³ See File Nos. SES-STA-20051216-1760 - Attachment A at p.3, SES-STA-20051216-1761 - Attachment A at p.3, SES-STA-20051216-1762 - Attachment A at p.3, SES-STA-20051216-1763 - Attachment A at p.3, SES-STA-20051216-1764 - Attachment A at p.3, SES-STA-20051222-01788 - Attachment A at pp. 2-3, and SES-STA-20051223-01790 - Attachment A at pp. 2-3.

Grant of the above-captioned STAs by January 13, 2006⁴ will ensure continued service to the Stratos, SkyWave and Satamatics customers while the Bureau resolves the issues associated with the underlying modification applications and the on-going Inmarsat/MSV spectrum dispute.

II. GRANT OF THE STA REQUESTS IS IN THE PUBLIC INTEREST

MSV believes that Applicants have failed to justify grant of their STA requests because the requests lack sufficient detail about the services being offered and their importance, and the requests lack an explanation as to their urgency.⁵ Applicants have provided sufficient detail in their STA requests and have demonstrated that grant of these STAs is in the public interest.

Having been licensed for over four years, the Stratos Inmarsat services, including B, C, M, mini-M and M4, are well-known by the Bureau and in the marketplace to offer (up to 64 kbps) voice and data satellite communications solutions to a wide-range of customers. As set forth in the Stratos STA requests, Stratos' U.S. military customers, including the U.S. Navy, U.S. Army and U.S. Air Force, rely on Stratos for military communications, such as those between U.S. Navy ships and land bases, and for Special Forces operating in remote areas.⁶ The Federal Government, including the State Department, FEMA, the U.S. Coast Guard and FBI use Inmarsat services for emergency relief (including in the wake of the recent hurricanes in the

⁴ The date of proposed satellite migration by Inmarsat is on Sunday January 15, 2006.

⁵ See MSV Comments at 3-4.

⁶ See File Nos. SES-STA-20051216-1760 - Attachment A at p.1, SES-STA-20051216-1761 - Attachment A at p.1, SES-STA-20051216-1762 - Attachment A at p.1, SES-STA-20051216-1763 - Attachment A at p.1, and SES-STA-20051216-1764 - Attachment A at p.1.

Gulf), law enforcement and homeland security.⁷ State and local government customers, including the New York Fire Department, the Los Angeles Fire Department and National Guard Units, similarly rely on the Stratos Inmarsat services for emergency relief.⁸ Private sector customers of Stratos, including some of the largest companies in the country (Chevron/Texaco, Global Santa Fe and Edison International), rely on Inmarsat services for business operations in remote areas, emergency communications (*e.g.*, restoring operations devastated in the Gulf) and to monitor and protect vital business assets.⁹

As set forth in the SkyWave and Satamatics requests, the Inmarsat D+ service provides end-users with the ability to track assets, and monitor and control production activities such as oil, gas and refinery operations.¹⁰ U.S. military users include the U.S. Navy, U.S. Coast Guard and Department of Defense, which rely on the Inmarsat D+ service for surveillance of marine vessels, homeland security and in the war against drugs.¹¹ The Federal Government, including the Drug Enforcement Agency ("DEA") and the Department of Homeland Security ("DHS"), use Inmarsat D+ for covert tracking applications.¹² Private sector end-users, including

⁷ See File Nos. SES-STA-20051216-1760 - Attachment A at pp.1-2, SES-STA-20051216-1761 - Attachment A at pp.1-2, SES-STA-20051216-1762 - Attachment A at pp.1-2, SES-STA-20051216-1763 - Attachment A at pp.1-2, and SES-STA-20051216-1764 - Attachment A at pp.1-2.

⁸ See File Nos. SES-STA-20051216-1760 - Attachment A at p.2, SES-STA-20051216-1761 - Attachment A at p.2, SES-STA-20051216-1762 - Attachment A at p.2, SES-STA-20051216-1763 - Attachment A at p.2, and SES-STA-20051216-1764 - Attachment A at p.2.

⁹ See *id.*

¹⁰ See File Nos. SES-STA-20051222-01788 - Attachment A at p.2 and SES-STA-20051223-01790 - Attachment A at p.2.

¹¹ See File Nos. SES-STA-20051222-01788 - Attachment A at p.1 and SES-STA-20051223-01790 - Attachment A at p.1.

¹² See *id.*

land and marine transport companies, security companies and utilities, use D+ to monitor natural gas well-heads, pipelines, shipping containers and service vehicles.¹³

The STA requests submitted by Applicants are clear -- disruption of the Inmarsat services offered by Stratos, SkyWave and Satamatics would not be in the public interest. Cutting off the Inmarsat services offered by Stratos would severely compromise the efforts of government "first responders" who rely on the Inmarsat services as a flexible and mobile back-up to terrestrial voice and data networks in the event that a natural disaster or terrorist attack takes place.¹⁴ Cutting off the Inmarsat D+ service offered by SkyWave and Satamatics would hinder homeland security, including surveillance efforts and early warnings for terrorist attacks, and interrupt the ability of private sector clients to monitor and control sensitive energy facilities and the transportation of cargo.¹⁵ Indeed, the public interest in ensuring the continued distribution of these services is well-established and cannot reasonably be questioned or challenged by MSV.

MSV also questions the urgency of the STA requests and wonders whether other alternatives are available.¹⁶ Applicants have been informed by Inmarsat that no other options are available. The second-generation Inmarsat satellite at 142° W.L. has just enough fuel left to reach a sufficient altitude to safely de-orbit. The overwhelming majority of the capacity on this satellite is dedicated to critical lease services to the U.S. Navy and U.S. Coast Guard. The third generation Inmarsat satellite currently at 54° W.L. is Inmarsat's only alternative to replace the

¹³ *See id.*

¹⁴ *See* File Nos. SES-STA-20051216-1760 - Attachment A at p.3, SES-STA-20051216-1761 - Attachment A at p.3, SES-STA-20051216-1762 - Attachment A at p.3, SES-STA-20051216-1763 - Attachment A at p.3, and SES-STA-20051216-1764 - Attachment A at p.3.

¹⁵ *See* File Nos. SES-STA-20051222-01788 - Attachment A at pp.2-3 and SES-STA-20051223-01790 - Attachment A at p.2-3.

¹⁶ *See* MSV Comments at 2-3.

satellite at 142° W.L. and continue these critical service offerings -- no other spare satellite capacity exists. From its orbital location at 52.75° W.L., the Inmarsat 4F2 has the capability to provide the existing Inmarsat services currently being provided by the third generation satellite at 54° W.L.

Delaying migration of services beyond January 15, 2006 will jeopardize the ability of Inmarsat to safely decommission the second generation satellite currently at 142° W.L. The requested STAs are needed now to ensure that the timely migration of satellites can take place without any service disruption while the Bureau continues its deliberations on the underlying modification applications filed by the parties.

III. GRANT OF THE STA REQUESTS WILL NOT CREATE ANY INTERFERENCE ISSUES

Applicants only seek authority to continue to provide longstanding Inmarsat services (using the Inmarsat 4F2 satellite) subject to the same conditions the Commission ordered in the existing licenses. These Inmarsat services have been provided with the current Inmarsat satellite for several years without causing harmful interference, and the parties do not expect any increase in interference when these services are provided using the Inmarsat 4F2.¹⁷ As explained in their STA requests, it is Applicants understanding from Inmarsat that operation of the existing Inmarsat services with the Inmarsat 4F2 will be within the technical envelope

¹⁷ Stratos was originally authorized to provide Inmarsat B, C, M, mini-M and M4 services in October 2001. Satamatics was authorized to provide the Inmarsat D+ service in March 2003. SkyWave was authorized to provide the Inmarsat D+ services in January 2004. As the Bureau has recognized, current L-band operators have been operating "interference-free" for some time. See *In the Matter of Mobile Satellite Ventures Subsidiary LLC*, DA 05-50, ¶ 23 (rel. Jan. 10, 2005) ("*MSV 63.5° W.L. Order*") ("While the most recent annual operator-to-operator agreement has not been renewed since 1999, the five parties have continued to coordinate their operations informally and have been operating interference-free."); *In the Matter of Mobile Satellite Ventures Subsidiary LLC*, DA 05-1492, ¶ 34 (rel. May 23, 2005) ("*MSV 101° W.L. Order*").

pursuant to which these services are currently provided on the third generation Inmarsat satellite located at 54° W.L.¹⁸ Specifically, (i) the EIRP spectral density of the proposed carriers on the Inmarsat 4F2 will be no greater than the EIRP spectral density of the same services provided today over the Inmarsat satellite at 54° W.L., (ii) the out-of-band emissions from the Inmarsat 4F2 carriers will not exceed the limits of §25.202(f) (1), (2) and (3), and (iii) no greater protection from interference into the Inmarsat 4F2 spacecraft or the Inmarsat mobile earth terminals, beyond the level of protection that exists today, is sought.¹⁹ In addition, Applicants have provided an extensive technical appendix describing the operations of its existing and evolved services with the Inmarsat 4F2 satellite in their underlying modification applications.²⁰

Despite these facts, MSV suggests that the provision of the currently authorized services using the Inmarsat 4F2 satellite will somehow be “problematic in terms of their impact on ... the L band interference environment ...”²¹ However, MSV fails to support its statements regarding the “L-band interference environment” with any technical analysis and instead relies only on several broad and conclusory statements regarding interference.²² The Commission has

¹⁸ See File Nos. SES-STA-20051216-1760 - Attachment A at p.3, SES-STA-20051216-1761 - Attachment A at p.3, SES-STA-20051216-1762 - Attachment A at p.3, SES-STA-20051216-1763 - Attachment A at p.3, SES-STA-20051216-1764 - Attachment A at p.3., SES-STA-20051222-01788 - Attachment A at pp.2-3, and SES-STA-20051223-01790 - Attachment A at pp.2-3.

¹⁹ See *id.*

²⁰ See File Nos. SES-MFS-20051122-01614, SES-MFS-20051122-01615, SES-MFS-20051122-01616, SES-MFS-20051122-01617, SES-MFS-20051122-01618, SES-MFS-2005, SES-MFS-20051202-01665, and SES-MFS-20051207-01709.

²¹ MSV Comments at 4.

²² For instance, MSV questions whether it is possible to operate Stratos’ existing services with the Inmarsat 4F2 in the same technical envelope as with the third generation Inmarsat satellite because of differences in the new satellite and the existing satellite or whether there is even a technical envelope under which Stratos has been providing its existing services because Inmarsat has not coordinated all of its operations. See MSV Comments at 5. In addition, MSV claims that Inmarsat has not provided enough information to evaluate whether there will be

consistently not relied on unsupported claims of interference or lack of interference²³ and the Bureau should not do so here. In contrast, Stratos, SkyWave and Satamatics have provided the technical parameters of the Inmarsat 4F2 and its operation to support their contention that grant of the STA requests are unlikely to adversely affect the current interference environment. There is no justification for the Bureau to conclude that grant of the STA requests will negatively impact the current interference environment. Further, Applicants recognize that any STA would be granted with a non-harmful interference condition.²⁴

IV. THE BUREAU SHOULD NOT IMPOSE THE MSV CONDITIONS

The Bureau should not impose the STA conditions advocated by MSV.²⁵ The MSV conditions represent a transparent effort by MSV to create leverage for its on-going

interference with MSV. *See* MSV Comments at 5. However, as discussed above, Stratos provided an extensive technical appendix in the underlying modification applications.

²³ *See, e.g., In the Matter of Creation of Low Power Radio Service*, Memorandum Opinion and Order on Reconsideration, 15 FCC Rcd 19208, 19221, ¶ 32 (2000) (rejecting unsupported and anecdotal evidence regarding interference); *In the matter of Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems*, Memorandum Opinion and Further Notice of Proposed Rulemaking, 18 FCC Rcd 3857, 3909, ¶ 135 (“We concur with XSI that the radio systems addressed by ARINC and by ATA were analyzed in the R&O or are below the frequency range employed by non-imaging UWB devices. ARINC and ATA provide no technical support for their claims that the operation of UWB devices under the adopted standards will result in harmful interference. Rather, their request to require uncoordinated imaging systems to operate above 5.5 GHz is based solely on unsupported conjecture. Absent any evidence that UWB operation under the rules could result in harmful interference to the authorized radio services, we find no justification for the petitioners request to disseminate coordination information for imaging systems on the Internet.”). Further, Section 25.154(a)(4) of the Commission’s Rules, 47 C.F.R. § 25.154(a), requires that petitions to deny, petitions for other forms of relief, and other objections or comments “[m]ust contain specific allegations of fact ... to support the relief requested ... which shall be sufficient to demonstrate ... that grant of, or other Commission action regarding, the application would be prima facie inconsistent with the public interest.”

²⁴ The appropriate condition on approval is that "harmful interference" not be caused, and not simply *any* interference as MSV suggests. *See* MSV Comments at 2 n.2.

²⁵ MSV Comments at 1-2.

spectrum dispute with Inmarsat. The forum for that dispute is not these STA requests or the underlying modification applications, but international coordination discussions. The Bureau must not let Stratos, SkyWave and Satamatics become pawns in those discussions. Further, imposing the MSV conditions would be entirely inconsistent with the Bureau's recent grant of authority for two MSV L-band satellites.

The first condition proposed by MSV - limiting the grant of the STA requests to only those frequencies not in dispute - is not appropriate. If MSV has a dispute over the current distribution and coordination of L-band spectrum, it should resolve this dispute with Inmarsat through international coordination, not by hijacking the requests and applications in this proceeding.²⁶ Stratos, SkyWave and Satamatics should be able to continue to use all frequencies that they are currently authorized to use in their licenses, subject to the outcome of any international coordination. Subject to a non-interference condition, the Commission has consistently held that MSV, TMI, Stratos and others can use the entire range of L-band frequencies in the absence of a coordination agreement.²⁷ There is no reason to treat Applicants differently now. If international coordination changes the spectrum available to Inmarsat, then Stratos, SkyWave and Satamatics will modify the operations of its existing services accordingly. Until that time, however, there is no reason to condition approval of the continuation of existing Inmarsat services on such a requirement.

²⁶ Despite what MSV may imply, the Bureau acknowledges in the *MSV 63.5° W.L. Order* and *MSV 101° W.L. Order* that "informal" arrangements now govern the coordination of L-band spectrum, not the 1999 coordination agreement. See *MSV 63.5° W.L. Order* at ¶ 23; *MSV 101° W.L. Order* at ¶ 34.

²⁷ See *MSV 101° W.L. Order* at ¶ 34; See *MSV 63.5° W.L. Order* at ¶ 23; *Inmarsat Market Access Order*, 16 FCC Rcd. at 21712; See *SatCom Systems, Inc. et al.*, 14 FCC Rcd. 20798, 20814 (1999) ("*TMI Market Access Order*").

MSV's suggestion that the grant of the STA requests should be conditioned on putting the parties on notice that any grant cannot be extended beyond June 30, 2006 unless Inmarsat completes satellite coordination is inconsistent with the treatment of recent MSV applications for L-band services. Just last year, the Bureau granted two MSV applications to operate in the L-band -- one for a replacement satellite at 101° W.L. and one for a new satellite (*i.e.*, a satellite not contemplated by the Mexico City MoU) at 63.5° W.L.²⁸ In the absence of a coordination agreement, the Commission did not impose any deadline to complete a new L-band coordination agreement, and granted both applications on a "non-harmful interference basis to other mobile-satellite service systems operating in the L-band."²⁹ Applicants request that the Bureau treat these requests similarly. Indeed, since the UK (the administration licensing the Inmarsat system and the home of Satamatics's ultimate corporate parent) and Canada (home of the ultimate corporate parents of Stratos and SkyWave) are WTO Members, the U.S. has an obligation to do so.³⁰

The final condition proposed by MSV -- that the Bureau make it clear that grant of the STA requests in no way eliminates Inmarsat's unfulfilled coordination obligations, including for its planned operations at 142° W.L. -- does not address the merits of the existing Inmarsat services that are the subject of the STA requests and is not an appropriate condition. In

²⁸ See *MSV 63.5° W.L. Order* and *MSV 101° W.L. Order*.

²⁹ See *MSV 63.5° W.L. Order* at ¶ 39; *MSV 101° W.L. Order* at ¶ 59.

³⁰ See *TMI Market Access Order*, 14 FCC Rcd. at 20813 (rejecting the attempt of AMSC to preclude other L-band systems from serving the U.S. until AMSC had completed coordination of 20 MHz of spectrum because doing so "would be inconsistent with U.S. market access commitments in the WTO Agreement"); *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Satellites Providing Domestic and International Service in the United States*, 12 FCC Rcd. 24094, 24104(1997) ("*DISCO II*") (recognizing the US commitment "to provide market access to all basic telecommunications services and national treatment to service suppliers of WTO members").

fact, this request serves to illustrate how MSV is trying to manipulate the STA requests of Applicants, who only seek to continue existing services that the Commission found to be in the public interest years ago, in order to gain leverage in its coordination dispute with Inmarsat. The Bureau should not encourage MSV's efforts in this regard by imposing conditions that do not address the merits of the existing Inmarsat services at issue.

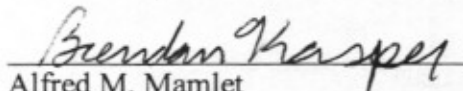
The proposed MSV conditions should be rejected by the Bureau. Applicants understand that grant of its STA requests would be without prejudice to the Bureau's action on the underlying modification applications and would be subject to a non-harmful interference condition.

V. CONCLUSION

For the reasons stated above and in the pending STA requests, Applicants respectfully request that the Bureau grant without any of the conditions proposed by MSV by January 13, 2006 their STA requests as set forth therein.

Respectfully submitted,

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January 6, 2006

CERTIFICATE OF SERVICE

I, Brendan Kasper, an attorney with the law firm of Steptoe & Johnson LLP, hereby certify that on this 6th day of January, 2006, served a true copy of the foregoing Reply Comments by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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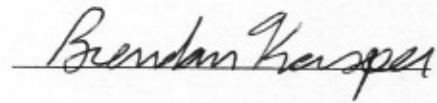
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