

STEPTOE & JOHNSON^{LLP}
ATTORNEYS AT LAW

Marc A. Paul
202.429.6484
mpaul@steptoe.com

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
Tel 202.429.3000
Fax 202.429.3902
steptoe.com

January 5, 2006

RECEIVED

JAN - 5 2006

Federal Communications Commission
Office of Secretary

BY HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street NW
Washington, DC 20554

Re: Stratos Communications, Inc.

ERRATA for File Nos. SES-STA-20051216-01760, SES-STA-20051216-01761, SES-STA-20051216-01762, SES-STA-20051216-01763 and SES-STA-20051216-01764

Dear Ms. Dortch:

Stratos Communications, Inc. ("Stratos") hereby files this "Errata" to correct certain typographical errors in the above-captioned requests for special temporary authorization. While each of the FCC 312 forms for the above-captioned requests contain the correct information regarding the relevant call-signs and services provided, there were several typographical errors in the narrative descriptions attached to these requests.

The typographical errors which Stratos seeks to correct are as follows:

SES-STA-20051216-01760 (E000180)

- In the last paragraph of page 1 of Attachment A, the FCC should be deleted from the list of government customers for the Inmarsat services distributed by Stratos.

Marlene H. Dortch
January 5, 2006
Page 2

SES-STA-20051216-01761 (E010047)

- In the last paragraph of page 1 of Attachment A, the FCC should be deleted from the list of government customers for the Inmarsat services distributed by Stratos.
- In first full paragraph of page 2 of Attachment A, the references in sentence 4 to "Inmarsat M4" should refer to "Inmarsat M" service and the call-sign reference to "E000180" should read "E010047." In addition the parenthetical listing the other Inmarsat services should read "including B, C, M4 and Mini-M."
- In the last paragraph of page 2 of Attachment A, the last sentence should refer to "Inmarsat M customers" and not "Inmarsat M4 customers."
- In the first paragraph of page 4 of Attachment A, the referenced file number should read "SES-MFS-20051122-01618" and the call-sign should read "E010047."

SES-STA-20051216-01762 (E010048)

- In first paragraph of page 1 of Attachment A, the referenced call-sign should be "E010048."
- In third paragraph of page 1 of Attachment A, the first sentence should refer to "File No. SES-MFS-20051122-01616" and to "call-sign E010048."
- Footnote 1 of Attachment A should refer to "Inmarsat M4, M, B, and C services."
- In the last paragraph of page 1 of Attachment A, the FCC should be deleted from the list of government customers for the Inmarsat services distributed by Stratos.
- In first full paragraph on page 2 of Attachment A, the first sentence should refer to "File No. SES-MFS-20051122-01616."
- In first full paragraph on page 2 of Attachment A, the second sentence should refer to "File No. SES-MFS-20051122-01616."
- In first full paragraph on page 2 of Attachment A, the references in sentence 4 to "Inmarsat M" should refer to "Inmarsat mini-M" service and the call-sign reference to "E010047" should read "E010048". In addition the parenthetical listing the other Inmarsat services should read "including B, C, M4 and M."
- In the last paragraph of page 2 of Attachment A, the last sentence should refer to "Inmarsat mini-M" and not "Inmarsat M."
- In the first paragraph of page 4 of Attachment A, the referenced file number should read "SES-MFS-20051122-01616" and the call-sign should read "E010048."

SES-STA-20051216-01763 (E010049)

- In first paragraph of page 1 of Attachment A, the referenced call-sign should be "E010049."
- In third paragraph of page 1 of Attachment A, the first sentence should refer to "File No. SES-MFS-20051122-01617" and to "call-sign E010049."
- Footnote 1 of Attachment A should refer to "Inmarsat M4, M, Mini-M, and C services."

Marlene H. Dortch
 January 5, 2006
 Page 3

- In the last paragraph of page 1 of Attachment A, the FCC should be deleted from the list of government customers for the Inmarsat services distributed by Stratos.
- In first full paragraph on page 2 of Attachment A, the first sentence should refer to "File No. SES-MFS-20051122-01617."
- In first full paragraph on page 2 of Attachment A, the second sentence should refer to "File No. SES-MFS-20051122-01617."
- In first full paragraph on page 2 of Attachment A, the references in sentence 4 to "Inmarsat mini-M" should refer to "Inmarsat B" service and the call-sign reference to "E010048" should read "E010049". In addition the parenthetical listing the other Inmarsat services should read "including C, M4, M and mini-M."
- In the last paragraph of page 2 of Attachment A, the last sentence should refer to "Inmarsat B" and not "Inmarsat mini-M."
- In the first paragraph of page 4 of Attachment A, the referenced file number should read "SES-MFS-20051122-01617" and the call-sign should read "E010049."

SES-STA-20051216-01764 (E010050)

- In the last paragraph of page 1 of Attachment A, the FCC should be deleted from the list of government customers for the Inmarsat services distributed by Stratos.

For the convenience of the Bureau, we have attached corrected versions of Attachment A for each of the applications to replace the current version of Attachment A. The changes listed above are the only changes made to corrected versions of Attachment A. Please feel free to contact me, if you have any questions regarding these applications.

Respectfully submitted,

Marc A. Paul / BDK

Marc A. Paul

Counsel for Stratos Communications, Inc.

Attachments

CERTIFICATE OF SERVICE

I, Brendan Kasper, an attorney with the law firm of Steptoe & Johnson LLP, hereby certify that on this 5th day of January, 2006, served a true copy of the foregoing letter by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

<p>James Ball* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>	<p>Andrea Kelly* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>
<p>Cassandra Thomas* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>	<p>Scott Kotler* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>
<p>Howard Griboff* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>	<p>Karl Kensinger* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>
<p>Fern Jarmulnek* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>	<p>John Martin* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>
<p>Stephen Duall* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>	<p>Jennifer A. Manner Vice President, Regulatory Affairs Mobile Satellite Ventures Subsidiary LLC 1002 Park Ridge Boulevard Reston, Virginia 20191</p>
<p>Robert Nelson* International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554</p>	<p>Bruce D. Jacobs David S. Konczal Pillsbury Winthrop Shaw Pittman LLP 2300 N Street, N.W. Washington, DC 20037-1128</p>

Marlene H. Dortch
January 5, 2006
Page 5

JoAnn Ekblad* International Bureau Federal Communications Commission 445 12 th Street, S.W. Washington, DC 20554	John P. Janka Jeffrey A. Marks Latham & Watkins LLP 555 Eleventh Street, N.W., Suite 1000 Washington, D.C. 20004
---	--

Brendan Kasper

* by Hand Delivery

DESCRIPTION OF STA REQUEST

By this application, Stratos Communications, Inc. ("Stratos") requests grant by January 13, 2006 of special temporary authority ("STA") for sixty (60) days to allow Stratos to maintain existing services to its currently licensed Inmarsat C terminals (call-sign E010050) with the recently launched fourth-generation Inmarsat satellite to be located at 52.75° W.L. ("Inmarsat 4F2").

Stratos is not asking to offer any new service. Stratos merely wants to continue to provide essential services, which have been licensed for more than four years, to the U.S. armed forces, Federal Emergency Management Agency ("FEMA"), U.S. Coast Guard, U.S. law enforcement, First Responders from state and local government, and important private sector customers.

Stratos recently filed a modification application (File No. SES-MFS-20051122-01615) for call-sign E010050 in order to add the Inmarsat 4F2 as a point of communication.¹ Stratos hereby incorporates by reference that modification application and its technical details and material for purposes of this STA request. The Stratos modification application was placed on Public Notice on December 7, 2005, and the time to file any Petitions and/or Comments on this modification application expires on January 6, 2006. On November 30, 2005, Mobile Satellite Ventures Subsidiary LLC ("MSV") filed a Notice of Intent to Participate, and in addition, it filed a Motion to designate the proceeding as "permit-but-disclose." *See* MSV Notice of Intent to Participate (Nov. 30, 2005); Motion to Designate Proceedings As "Permit-But-Disclose" (Nov. 30, 2005).

Since October 2001, Stratos has been licensed by the FCC to provide Inmarsat services domestically in the United States, including the operation of Inmarsat B, C, M, mini-M and M4 terminals.² As set forth in the attached Declaration of Robert J. Roe, Senior Vice President of Sales for Stratos, Stratos's customers for Inmarsat services encompass a wide range of U.S. customers, including the U.S. military, the Federal Government, state and local governments and private sector end-users. *See* Declaration of Robert J. Roe at ¶ 5 (Attachment B). U.S. military users include: the U.S. Army, Navy and Air Force. *See* Declaration of Robert J. Roe at ¶ 6. Federal Government users include: the State Department, FEMA, the U.S. Coast

¹ Additional modification applications were filed to modify the call-signs associated with the Stratos licenses to provide the Inmarsat M, mini-M, M4, and B services. Similar STA requests are being filed for each of these services.

² *See, e.g., In the Matter of COMSAT Corporation d/b/a COMSAT Mobile Communications et al.*, 16 FCC Rcd 21661 (rel. Oct. 9, 2001) ("Inmarsat Market Access Order").

Guard and the Federal Bureau of Investigation. *See* Declaration of Robert J. Roe at ¶ 7. State and local government customers include: New York Fire Department, Los Angeles Fire Department and National Guard Units restoring devastated areas impacted by the recent hurricanes in the Gulf. *See* Declaration of Robert J. Roe at ¶ 8. U.S. private sector customers include: Chevron/Texaco, Global Santa Fe and Edison International (parent company of Southern California Edison). *See* Declaration of Robert J. Roe at ¶ 9.

As set forth in File No. SES-MFS-20051122-01615, the Inmarsat 4F2 is licensed by the United Kingdom and will be located at the 52.75° W.L. orbital location. It was launched on November 8, 2005. As set forth in File No. SES-MFS-20051122-01615, grant of the modification application is in the public interest, is consistent with the ORBIT Act³ and satisfies the Commission's *DISCO II* standard.⁴ Absent authority to communicate with the Inmarsat 4F2, Stratos will not be able to continue to provide the Inmarsat C service, licensed under call-sign E010050, to its existing or future customers because the Inmarsat C service, along with other Inmarsat services (including B, M, mini-M and M4), will be migrated from the third generation Inmarsat satellite currently at 54° W.L. to the Inmarsat 4F2 satellite at 52.75° W.L.

Inmarsat is scheduled to migrate these services to the Inmarsat 4F2 on January 15, 2006. Stratos has been informed by Inmarsat that maintaining this schedule is necessary because the Inmarsat 3 satellite currently 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 needs to be decommissioned shortly. This second generation satellite at 142° W.L. is currently providing essential Inmarsat lease services to the U.S. Navy and U.S. Coast Guard. *See* Declaration of Robert J. Roe at ¶ 4. An untimely migration of the "existing and evolved services" from the third generation Inmarsat satellite to the new Inmarsat 4F2 satellite would jeopardize the continuity of these essential services currently being provided by the second generation satellite at the 142° W.L. orbital location.

Since the current Public Notice period for the Stratos modification application is scheduled to expire on January 6, 2006 and MSV has already indicated its intent to participate in this application proceeding, Stratos believes that it is unlikely that the International Bureau will be able to act on the modification application in advance of the scheduled January 15, 2006 migration of the Inmarsat C service to the new Inmarsat 4F2 satellite at 52.75° W.L.⁵ Accordingly, Stratos is requesting this STA to ensure that there is no disruption of service to Stratos's existing Inmarsat C customers when Inmarsat migrates the services to the new satellite.

³ *See* 47 U.S.C. § 761 *et seq.*

⁴ *See Amendment of the Commission's Policies to Allow Non-U.S. Licensed Space Stations Providing Domestic and International Service in the United States*, 12 FCC Rcd 24094 (1997) ("*DISCO II*").

⁵ In all likelihood, Stratos and MSV will be in the middle of the pleading cycle for the Stratos modification application.

Grant of this STA request is in the public interest. As set forth above, the Inmarsat services provided by Stratos are used not only by private industry, but also by the U.S. military, Federal Government, and state and local government. The Inmarsat services are used by these entities to facilitate military communications, law enforcement and homeland security, emergency relief efforts, protect lives and safeguard property and to provide critical communications services to support business operations in remote areas. *See* Declaration of Robert J. Roe at ¶¶ 5-8. Grant of this STA request will ensure that these end-users do not experience any disruption to the Inmarsat services they currently use and rely on.

As stated by Mr. Roe, "Inmarsat services are used and critically relied upon by government 'First Responders' and private industry, as a flexible and mobile backup to terrestrial voice and data communications networks in the event that a natural disaster or terrorist attack takes place." *See* Declaration of Robert J. Roe at ¶ 10. Any disruption to the Inmarsat services used by First Responders would seriously compromise their ability to accomplish their critical missions. *See* Declaration of Robert J. Roe at ¶ 10.

"The necessity of Inmarsat services was clearly demonstrated in the aftermath of hurricanes Katrina, Rita and Wilma in the Gulf of Mexico. In response to these devastating natural disasters, Stratos saw a noticeable increase in the demand for the Inmarsat services it distributes. Several months later, Inmarsat services continue to play a vital role in the Gulf of Mexico region in connection with the recovery and restoration efforts being undertaken by FEMA, the National Guard, the U.S. Army, state and local governments, law enforcement personnel and the petroleum industry." *See* Declaration of Robert J. Roe at ¶ 11. In the words of Chairman Martin:

If we learned anything from Hurricane Katrina, it is that we cannot rely solely on terrestrial communications. When radio towers are knocked down, satellite communications are, in some instances, the most effective means of communicating.

See Written Statement of Chairman Kevin J. Martin at the Hearing on Communications in a Disaster before the U.S. Senate Committee on Commerce, Science and Transportation at 7 (Sept. 22, 2005). The grant of this STA would ensure that there is no disruption in service to these end-users currently using and relying upon Inmarsat services.

The Inmarsat services which currently are being provided over the Inmarsat satellite at 54° W.L. can and will be provided over the Inmarsat 4F2 at 52.75° W.L. without adversely affecting the interference environment that exists today with respect to other operating L-Band spacecraft. 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. In sum, during the term of this STA, these services can and will be provided on Inmarsat 4F2 within the technical envelope pursuant to which these services are currently provided on the third generation Inmarsat satellite currently located at 54° W.L.

Stratos understands that grant of this requested STA will be without prejudice to, and will be conditioned on, the Bureau's action on the underlying modification application (File No. SES-MFS-20051122-01615) to modify call-sign E010050 to add the Inmarsat 4F2 as an authorized point of communication.

For the reasons set forth above, Stratos respectfully requests that this STA be granted no later than January 13, 2006⁶ for sixty (60) days.

⁶ January 13, 2006 is the last business day before the planned January 15, 2006 cut-over to the Inmarsat 4F2 satellite of the "existing and evolved" services.