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February 17, 2006

BY HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: SkyWave Mobile Communications, Corp.
SkyWave Mobile Communications, Inc.
File Nos. SES-STA-20051222-01788, ITC-STA-20060121-00028**

Dear Ms. Dortch:

On behalf of SkyWave Mobile Communications, Corp. and SkyWave Mobile Communications, Inc. (collectively "SkyWave"), this letter is being submitted in response to condition 3 of the above-referenced special temporary authorizations ("STAs") issued by the International Bureau ("the Bureau").

SkyWave's STAs are limited to the Inmarsat D+ service. This service is a non-voice, packet-data service with message sizes limited to 84 bits in the "return" (terminal-to-satellite) direction and 2000 bits in the "forward" (satellite-to-terminal) direction. The maximum data rate is 128 bits per second. Since the Inmarsat D+ service is confined to small messages at a low data rate, this service uses very little spectrum. On the Inmarsat 4F2, SkyWave uses only one "forward" 2.5 kHz channel and six "return" 2.5 kHz channels.

Inmarsat D+ is used for tracking and monitoring applications. SkyWave's customers encompass a wide range of U.S. customers, including the U.S. military, Federal Government, Federal law enforcement and private sector end-users. The Inmarsat D+ service is used by these entities to track the location and behavior of assets like trucks or boats or other movable assets, and to monitor the status and condition of facilities (e.g., energy facilities) to ensure that they are functioning properly. Disruption of the service could jeopardize the success of critical law enforcement and homeland security applications of the Inmarsat D+ service and endanger the security and safe operation of assets held by SkyWave's private sector clients.

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Federal Communications Commission
Office of Secretary

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Satellite Division
International Bureau

Condition 3 of the STAs requires SkyWave to submit to the Bureau by February 17, 2006 a report containing two items: (1) an analysis of "whether, given the increased capacity of the Inmarsat 4F2 satellite 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 spectrum¹ be terminated (we refer to this reporting obligation as the "Inmarsat Operations Analysis"); and (2) a list of end users that operate in the disputed spectrum under the STA and a list of end users that operate under the STA in frequencies other than the disputed spectrum, but who would still be potentially affected if access to the disputed spectrum were terminated (we refer to this reporting obligation as "SkyWave Customer Information").

With respect to the Inmarsat Operations Analysis, concurrently with this submission, SkyWave understands that Inmarsat is submitting to the Commission a report which addresses the Bureau's inquiries as to the effect that terminating access to the disputed spectrum would have on existing Inmarsat operations.

With respect to the SkyWave Customer Information, SkyWave advises the Bureau that the Inmarsat D+ service on the Inmarsat 4F2 satellite is not using any of the disputed spectrum. To the extent that Inmarsat's access to the disputed spectrum were terminated, however, Inmarsat would need to reevaluate its entire frequency plan, and decide which services would get less spectrum. It is not possible to reduce the spectrum SkyWave uses for the D+ service without compromising the reliability and effectiveness of the service. Since there is only one forward channel, if it is eliminated, the service cannot function. If a return channel used by SkyWave is eliminated, it would significantly increase the call-blockage probability equally for all of SkyWave's U.S. customers using the Inmarsat 4F2. As a result, messages from the Inmarsat D+ METs may never reach their intended destination. This would compromise the ability of SkyWave's customers to accurately track or monitor assets or to receive critical messages about the condition of sensitive facilities. This service degradation could compromise applications for the military, homeland security and law enforcement agencies, and other users of the service.

If Inmarsat were to conclude that it was necessary to reduce the number of dedicated channels for the Inmarsat D+ service, this loss of channels would affect all of SkyWave's customers operating in the United States. As SkyWave previously disclosed to the Bureau in its STA requests, SkyWave's Inmarsat D+ U.S. military and government customers include the Department of Defense Counter-Narcoterrorism Technology Program Office, the Naval Surface Warfare Centre, Department of

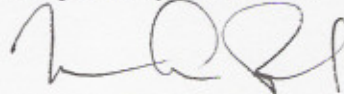
¹ SkyWave uses the neutral term, "disputed spectrum," in discussing certain bandwidth segments made available for Inmarsat's use "as part of the Revised 1999 Spectrum Sharing Arrangement (October 4, 1999), or later as bilateral arrangements between Inmarsat and MSV and Inmarsat and MSV Canada," which are now the subject of a dispute with MSV and MSV Canada. See STA at File No. SES-STA-20051222-01788 at Condition 3 (Jan. 18, 2006).

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Homeland Security and the DEA. SkyWave's private sector customers include Teletouch, Optec and Global Secure Cargo, which use the Inmarsat D+ service to track and monitor sensitive assets (e.g., trucks and shipping containers) and facilities (e.g., energy facilities) throughout the country.²

Please contact the undersigned if you would like to discuss this submission or would like additional information on all or part of SkyWave's U.S. customer base (even though none of the Inmarsat D+ service is in the disputed spectrum).

Respectfully submitted,



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and SkyWave Mobile Communications, Inc.*

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² See Declaration of Ani Tourian at ¶¶ 5-8 (Attachment B of the STA Request in File No. SES-STA-20051222-01788) (incorporated herein by reference).