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March 3, 2006

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Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Satellite Division
International Bureau

Federal Communications Commission
Office of Secretary

Re: Satamatics Communications, Inc., Request for Special Temporary Authority, IBFS File No. SES-STA-20051223-01790;
SkyWave Communications, Inc., Request for Special Temporary Authority, IBFS File No. SES-STA-20051222-01788;
Stratos Communications, Inc., Requests for Special Temporary Authority, IBFS File Nos. SES-STA-20051216-01760, SES-STA-20051216-01761, SES-STA-20051216-01762, SES-STA-20051216-01763, SES-STA-20051216-01764;
Telenor Satellite, Inc., Requests for Special Temporary Authority, IBFS File Nos. SES-STA-20051216-01756, SES-STA-20051216-01757, SES-STA-20051216-01758, SES-STA-20051216-01759; SES-STA-20060118-00055; SES-STA-20060118-00056; SES-STA-20060118-00057; SES-STA-20060118-00058; SES-STA-20060119-00064

Dear Ms. Dortch:

Mobile Satellite Ventures L.P. ("MSV") hereby submits this letter to assist the Commission's review of reports submitted on February 17, 2006 in connection with the above-referenced applications.

On January 18, 2006, the Commission granted the requests of Satamatics¹ SkyWave² and Stratos³ for Special Temporary Authority to serve mobile earth terminals using recently-launched Inmarsat 4F2 at 52.75° W.L. On January 19, 2006, the

¹ See Satamatics Communications, Inc., Request for Special Temporary Authority, IBFS File No. SES-STA-20051223-01790 (granted Jan. 18, 2006).

² See SkyWave Communications, Inc., Request for Special Temporary Authority, IBFS File No. SES-STA-20051222-01788 (granted Jan. 18, 2006).

³ See Stratos Communications, Inc., Requests for Special Temporary Authority, IBFS File Nos. SES-STA-20051216-01760, SES-STA-20051216-01761, SES-STA-20051216-01762, SES-STA-20051216-01763, SES-STA-20051216-01764 (collectively granted Jan. 18, 2006).

Commission granted a similar request of Telenor.⁴ As a condition of these grants, each of the applicants was required to file, no later than February 17, 2006, a report addressing whether the Commission's termination of access by Inmarsat to certain L band spectrum loaned to it by MSV would cause any discontinuance or degradation of the Inmarsat Resellers' existing operations.

MSV respectfully requests that the Commission analyze these reports in light of the following questions, and seek additional information from the applicants or Inmarsat to the extent necessary to sufficiently address these questions:

1. Given the total amount of system spectrum available to Inmarsat via its satellite networks at AORE, AORW, POR and INM-2 satellites at 98° W and 142° W, why is the loaned spectrum needed at all by INMARSAT? Why is the loaned spectrum selected to serve US government users?
2. Is the loaned spectrum being used on all Inmarsat satellites that are visible to North America? For example, is the loaned spectrum being used on the Inmarsat-3 satellite at 15° W.L., the Inmarsat-2 satellite at 98° W.L., the Inmarsat-2 satellite at 142° W.L. (which is to be replaced by the Inmarsat-3 satellite that had been at 52.75° W.L.), and the Inmarsat-3 POR satellite?
3. Is all of the loaned spectrum being used to serve U.S. Government users? If only a portion of the loaned spectrum is serving U.S. Government users, specifically which frequencies are being used to serve U.S. Government users?
4. How much of the loaned spectrum is being used for each of the different Inmarsat service offerings (e.g., Inmarsat-A, Inmarsat-B, Inmarsat-C, Inmarsat Mini-M)?
5. Is the loaned spectrum being provided on a leased basis or a dynamically frequency assigned basis? If both, how much of the loaned spectrum is being provided on a leased basis and on which satellites, and which customers are being served pursuant to such leases?
6. If the users are assigned dynamically to individual frequencies on a demand basis, why do they need to be assigned to the loaned spectrum? Will there be any discontinuance or degradation of service to existing users either assigned to non-loaned or loaned spectrum, if the loaned spectrum is not available?

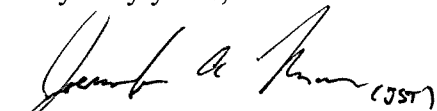
⁴ See Telenor Satellite, Inc., Requests for Special Temporary Authority, IBFS File Nos. SES-STA-20051216-01756, SES-STA-20051216-01757, SES-STA-20051216-01758, SES-STA-20051216-01759; SES-STA-20060118-00055; SES-STA-20060118-00056; SES-STA-20060118-00057; SES-STA-20060118-00058; SES-STA-20060119-00064 (collectively granted Jan. 19, 2006).

7. If a discontinuance of service is anticipated, how is it determined which customers or services are to be discontinued?
8. If a degradation of service is anticipated, how is that degradation quantified, and what is Inmarsat's priority protocol to determine which services and customers are to receive a degraded quality of service. How is that priority protocol determined?
9. Given that the Inmarsat-4 satellite is a more powerful and spectrally efficient satellite than the Inmarsat-3 satellite that it is replacing, why is there a need to continue using loaned spectrum to serve customers from the 52.75° W.L. location? Is there other spectrum assigned to Inmarsat at this location that is suitable to serve these customers? If not, why not? Specifically, the Inmarsat 4 satellite has more regional beams and consequently has more frequency reuse capability than the Inmarsat-3 satellite. Why can't this frequency reuse capability be used to reassign more efficiently the Inmarsat services in such a way that the loaned spectrum is no longer needed to serve these customers? For example, the transition of the Inmarsat Mini M and Inmarsat M4 traffic from the Inmarsat-3 satellite to the Inmarsat-4 satellite regional beams should halve the spectrum requirement for these two major users of spectrum.
10. Can these customers be served from other Inmarsat satellite locations on spectrum that was not loaned to Inmarsat? If not, why not? For example, if the loaned spectrum was being used on only one satellite (e.g. the Inmarsat-3 satellite that is being moved from AOR W), why couldn't certain services, such as Inmarsat M4, be placed on AOR E or POR satellites to relieve the need for spectrum on the AOR W satellite?
11. Is the loaned spectrum being used only to support Inmarsat spot or regional beams at the Inmarsat AOR E, AOR W or POR locations? If this is the case, then 4.8 MHz (3x1.6 MHz) of spectrum is being used to serve U.S. Government users. What are the U.S. government service requirements that support this large amount of satellite capacity?

Marlene Dortch
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Please contact the undersigned should you have any questions in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jennifer A. Manner" with a stylized flourish at the end.

Jennifer A. Manner
Vice President, Regulatory Affairs
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CERTIFICATE OF SERVICE

I, Sylvia A. Davis, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that on this 3rd day of March, 2006, I served a true copy of the foregoing by first-class United States mail, postage prepaid, upon the following:

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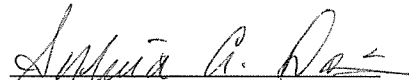
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