

STEPTOE & JOHNSON ^{LLP}

ATTORNEYS AT LAW

Alfred M. Mamlet
202.429.6205
amamlet@steptoe.com

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

February 17, 2006

BY HAND DELIVERY

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

Re: Satamatics, Inc.
File Nos. SES-STA-20051223-01790, ITC-STA-20060121-00027

Dear Ms. Dortch:

On behalf of Satamatics, Inc. ("Satamatics"), 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").

Satamatics' 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 1000 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, Satamatics uses only one "forward" 2.5 kHz channel and three "return" 2.5 kHz channels.

Inmarsat D+ is used for tracking and monitoring applications. Satamatics' customers for Inmarsat services encompass a wide range of U.S. customers, including the U.S. military 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., oil and gas pipelines and natural gas compressors) to ensure that they are functioning properly. Disruption of the service would hinder U.S. military and homeland security efforts, including surveillance and warnings for potential terrorist hijackings of marine vessels. In addition, an interruption of the service would compromise the ability of Satamatics' private sector clients to track

RECEIVED

FEB 17 2006

Federal Communications Commission
Office of Secretary

RECEIVED

FEB 22 2006

Satellite Division
International Bureau

their assets and to monitor sensitive energy facilities, including natural gas well heads, pipelines, shipping containers and service vehicles.

Condition 3 of the STAs requires Satamatics 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 "Satamatics Customer Information").

With respect to the Inmarsat Operations Analysis, concurrently with this submission, Satamatics 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 Satamatics Customer Information, Satamatics 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 Satamatics 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 Satamatics is eliminated, it would significantly increase the call-blockage probability equally for all of Satamatics' 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 Satamatics' 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 Satamatics' customers operating in the United States. As Satamatics previously disclosed to the Bureau in its STA request,

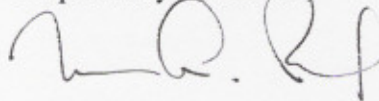
¹ Satamatics uses the neutral term, "disputed spectrum," in discussing certain bandwidth segments made available for Inmarsat's use "as part of the Revised 1999 Spectrum Sharing Arrangement (October 4, 1999), or later as bilateral arrangements between Inmarsat and MSV and Inmarsat and MSV Canada," which are now the subject of a dispute with MSV and MSV Canada. *See* STA at File No. SES-STA-20051223-01790 at Condition 3 (Jan. 18, 2006).

Marlene H. Dortch
February 17, 2006
Page 3

Satamatics' Inmarsat D+ U.S. military customers include the U.S. Coast Guard and the U.S. Navy. Satamatics' private sector customers include Centerpoint Energy, M2M, American Electric Power, PS Energy, Halliburton, Chevron, Air Liquide, and Air Products, which use the Inmarsat D+ service to track and monitor sensitive assets (e.g., trucks and shipping containers) and facilities (e.g., oil and gas pipelines and natural gas compressors).²

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

Respectfully submitted,



Alfred M. Mamlet
Marc A. Paul

Counsel for Satamatics, Inc.

cc (by hand delivery):

Roderick Porter (International Bureau)
Robert Nelson (International Bureau)
Gardner Foster (International Bureau)
James Ball (International Bureau)
Andrea Kelly (International Bureau)
Cassandra Thomas (International Bureau)
Howard Griboff (International Bureau)
Scott Kotler (International Bureau)
Karl Kensinger (International Bureau)
Fern Jarmulnek (International Bureau)
Stephen Duall (International Bureau)
John Martin (International Bureau)
JoAnn Ekblad (International Bureau)
Bruce Jacobs (Counsel for MSV) - by first class mail

² See Declaration of Brian Hester at ¶¶ 5-7 (Attachment B of the STA Request in File No. SES-STA-20051223-01790) (incorporated herein by reference).