

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Stratos Communications, Inc.)	SES-STA-20060307-00374
)	SES-STA-20060307-00375
)	SES-STA-20060307-00376
)	SES-STA-20060307-00377
)	SES-STA-20060307-00378
)	
SkyWave Mobile Communications, Corp.)	SES-STA-20060307-00372
)	
Satamatics, Inc.)	SES-STA-20060307-00373
)	

To: International Bureau

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 renewal of special temporary authority ("STA").¹ The International Bureau ("the Bureau") should renew the STAs currently held by the Applicants to ensure that existing Inmarsat services being provided to a wide-range of U.S. military, U.S. government and private sector end-users are not disrupted.

The Applicants have filed applications to modify their existing authorizations to operate Inmarsat terminals to include the fourth-generation Inmarsat satellite located at 52.75°

¹ See MSV Comments (March 13, 2006) ("MSV Comments").

W.L. ("Inmarsat 4F2") as a point of communication.² Those modification applications remain pending and since January 18, 2006, the Applicants have been providing existing Inmarsat services using the Inmarsat 4F2 pursuant to STAs, which are scheduled to expire on March 19, 2006.³

Prompt renewal of the STAs held by the Applicants is in the public interest. As the Applicants have clearly set forth, 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.⁴ Any disruption to these services would be devastating to these essential activities and clearly would not be in the public interest.

In its Comments, MSV suggests that conditions should be imposed upon the renewal of the Stratos, SkyWave and Satamatics STAs in order to limit their use of certain L-band frequencies on the Inmarsat 4F2 satellite.⁵ MSV's suggestion should be rejected as a transparent attempt to use the Applicant's STA renewals (and their underlying modification

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.

³ See File Nos. 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), SES-STA-20051222-01788 (E030055), SES-STA-20051223-01790 (E020074). In addition, Stratos, SkyWave and Satamatics hold STAs for the necessary Title II authority to offer Inmarsat services using the Inmarsat 4F2. See File Nos. ITC-STA-20060121-00029, ITC-STA-20060121-00027 and ITC-STA-20060121-00028. STA renewal applications have been filed for these STAs (due to expire on March 23, 2006) as well. MSV has not filed Comments with respect to these Title II STA renewal applications.

⁴ See Attachment A of File Nos. SES-STA-20060307-00374, SES-STA-20060307-00375, SES-STA-20060307-00376, SES-STA-20060307-00377, SES-STA-20060307-00378, SES-STA-20060307-00372 and SES-STA-20060307-00373.

⁵ MSV Comments at 2.

applications) as leverage in its on-going spectrum dispute with Inmarsat. If MSV has a dispute over the current allocation of L-band spectrum, it should resolve this dispute with Inmarsat through international coordination, not by hijacking these STA renewals and the underlying modification applications in this proceeding. 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.⁶ 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.

Prompt renewal of the STAs held by Stratos, SkyWave and Satamatics (without any conditions proposed by MSV) 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.

⁶ As the Applicants have previously pointed out, 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 *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*"). There is no reason to treat Applicants differently now.

Respectfully submitted,

Stratos Communications, Inc.
SkyWave Mobile Communications, Corp.
Satamatics, Inc.

A handwritten signature in black ink, appearing to read 'MAMLET', written over a horizontal line.

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March 16, 2006

CERTIFICATE OF SERVICE

I, Marc A. Paul, an attorney with the law firm of Steptoe & Johnson LLP, hereby certify that on this 16th day of March, 2006, I 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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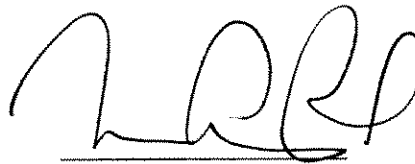
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