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March 29, 2006

Via Hand Delivery

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

**Re: Consolidated Petition to Deny of Mobile Satellites Ventures Subsidiary LLC
Stratos Communications, Inc., File No. SES-STA-20060310-00419 (Call Sign E050249)
Telenor Satellite, Inc ; File No. SES-STA-20060313-00430 (Call Sign E050276)
FTMSC US LLC; File No. SES-STA-20060314-00438 (Call Sign E050284)
BT Americas, Inc.; File No. SES-STA-20060315-00445 (Call Sign E060076)
MVS USA Inc.; File No. SES-STA-20060316-00454 (Call Sign E050348)**

Dear Ms. Dortch:

Mobile Satellites Ventures Subsidiary LLC (“MSV”) hereby files this redacted, public version of a Consolidated Petition to Deny the above-referenced applications for Special Temporary Authority (“STA”) to operate 25,000 Broadband Global Area Network (“BGAN”) terminals using an Inmarsat satellite, Inmarsat 4F2 at 52.75°W, for which coordination is not complete.¹ Exhibits A and B of this Consolidated Petition were filed previously with the Commission on January 13, 2006 and February 7, 2006, respectively, along with requests for confidential treatment.² This information should continue to be treated confidentially for the reasons set forth in Exhibits A and B.³

¹ See Stratos Communications, Inc., Request for Special Temporary Authority, File No. SES-STA-20060310-00419 (March 10, 2006) (“*Stratos STA Request*”); Telenor Satellite, Inc., Request for Special Temporary Authority, File No. SES-STA-20060313-00430 (March 13, 2006) (“*Telenor STA Request*”); FTMSC US LLC, Request for Special Temporary Authority, File No. SES-STA-20060314-00438 (March 14, 2006) (“*FTMSC STA Request*”); BT Americas, Inc., Request for Special Temporary Authority, File No. SES-STA-20060315-00445 (March 15, 2006) (“*BT Americas STA Request*”); MVS USA Inc., Request for Special Temporary Authority, File No. SES-STA-20060316-00454 (Call Sign E050348) (“*MVS STA Request*”).

² See Letter from Jennifer A. Manner, MSV, to Ms. Marlene H. Dortch, FCC, File No. SES-MFS-20051123-01634 (January 13, 2006); Letter from Jennifer A. Manner, MSV, to Ms. Marlene H. Dortch, FCC, File No. SES-MFS-20051123-01634 (February 14, 2006).


³ 47 C.F.R. § 0.459(b).

Ms. Marlene H. Dortch
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Please contact the undersigned with any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jennifer A. Manner". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke extending to the right.

Jennifer A. Manner

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)	
)	
Stratos Communications, Inc.)	File No. SES-STA-20060310-00419 (Call Sign E050249)
)	
Telenor Satellite, Inc.)	File No. SES-STA-20060313-00430 (Call Sign E050276)
)	
FTMSC US LLC)	File No. SES-STA-20060314-00438 (Call Sign E050284)
)	
BT Americas, Inc.)	File No. SES-STA-20060315-00445 (Call Sign E060076)
)	
MVS USA Inc.)	File No. SES-STA-20060316-00454 (Call Sign E050348)

CONSOLIDATED PETITION TO DENY

Mobile Satellite Ventures Subsidiary LLC (“MSV”) hereby files this Consolidated Petition to Deny the above-referenced applications for Special Temporary Authority (“STA”) to operate 25,000 Broadband Global Area Network (“BGAN”) terminals using an Inmarsat satellite, Inmarsat 4F2 at 52.75°W, for which coordination is not complete. The STA applications have nothing to do with providing “temporary” authority. They are nothing more than an end run around the pending applications for regular authority to provide BGAN service.

The applicants have not even come close to satisfying the “extraordinary circumstances” standard justifying grant of the STA requests. The only justifications provided in support of the STAs are “marketing considerations,” which the Commission’s rules specifically preclude as grounds for granting an STA. As the Commission knows all too well, once authorized, it will be impossible to shut down the service if, in acting on the pending applications, it determines that MSV is correct in its position that initiation of BGAN service prior to full coordination of the Inmarsat 4F2 satellite is not in the public interest. MSV too has found that once Inmarsat commences service – in MSV’s case on “loaned” frequencies - it is virtually impossible to restore the *status quo ante*.

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A prompt denial of the STA requests will serve to reaffirm that the Commission will not permit STAs to be used to bypass the application process. Denial of the STA requests also will send a strong message that satellite operators must take their international coordination obligations seriously.

Discussion

In the above-referenced applications, Stratos Communications, Inc., Telenor Satellite, Inc., FTMSC US LLC, BT Americas, Inc., and MVS USA Inc. (collectively, the Applicants) seek STAs to operate a total of 25,000 BGAN terminals with the uncoordinated Inmarsat 4F2 satellite at 52.75°W beginning on April 17, 2006.¹ The Applicants have previously filed for permanent authority to operate BGAN terminals in the United States.² MSV has opposed these applications because of the interference that will result both to MSV and to Inmarsat from operation of BGAN terminals prior to a coordination agreement. The interference will result from (i) use of Inmarsat 4F2 to operate on the loaned frequencies Inmarsat has refused to return;³ (ii) the technically different parameters of Inmarsat's new satellite and services relative to the satellites and services it has coordinated previously, such as the use of wideband carriers, higher

¹ See Stratos Communications, Inc., Request for STA, File No. SES-STA-20060310-00419 (March 10, 2006) ("*Stratos STA Request*"); Telenor Satellite, Inc., Request for STA, File No. SES-STA-20060313-00430 (March 13, 2006) ("*Telenor STA Request*"); FTMSC US LLC, Request for STA, File No. SES-STA-20060314-00438 (March 14, 2006) ("*FTMSC STA Request*"); BT Americas, Inc., Request for STA, File No. SES-STA-20060315-00445 (March 15, 2006) ("*BT Americas STA Request*"); MVS USA Inc., Request for STA, File No. SES-STA-20060316-00454 (Call Sign E050348) ("*MVS STA Request*").

² See, e.g., Stratos Communications, Inc., Application, File No. SES-LFS-20050826-01175 (August 26, 2005); Telenor Satellite, Inc., Application, File No. SES-LFS-20050930-01352 (September 30, 2005); FTMSC US, LLC, Application, File No. SES-LFS-20051011-01396 (October 11, 2005); MVS USA, Inc., Application, File No. SES-LFS-20051123-01634 (November 23, 2005); BT Americas, Inc., Application, File No. SES-LFS-20060303-00343 (March 3, 2006).

³ See Mobile Satellite Ventures Subsidiary LLC, Petition to Hold in Abeyance MVS Application, File No. SES-MFS-20051123-01634 (January 13, 2006) ("*MSV Petition*"), at 11-12 (attached as Exhibit A); Mobile Satellite Ventures Subsidiary LLC, Reply, File No. SES-MFS-20051123-01634 (February 7, 2006) ("*MSV Reply*"), at 2-7 (attached as Exhibit B). MSV hereby attaches and incorporates by reference these filings in the above-referenced proceedings.

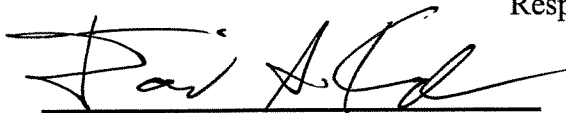
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aggregate EIRP, and increase in number of co-channel reuse beams;⁴ and (iii) Inmarsat's claim that it is entitled to operate on each and every frequency in the L band.⁵


There are no "extraordinary circumstances" justifying grant of the STA requests;⁶ there is only the Applicants' lack of respect for the Commission's processes. The Commission's rules specifically state that "[c]onvenience to the applicant, such as marketing considerations or meeting scheduled customer in-service dates" is not sufficient to demonstrate "extraordinary circumstances." 47 C.F.R. § 25.120(b)(1). The Applicants do not seek a waiver of this rule.

Indeed, the only public interest claim the Applicants make is that BGAN service will permit "higher speed" MSS than what is currently available.⁷ While higher speed MSS is desirable, it does not outweigh the harm that will result from permitting satellite operators to bypass the frequency coordination process and from undermining the Commission's application process.⁸ Denial of these requests will have the salutary effect of reinforcing both processes.

Respectfully submitted,



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Jennifer A. Manner
Vice President, Regulatory Affairs
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Dated: March 29, 2006

⁴ See Exhibit A at 13-17; Exhibit B at 7-13.

⁵ See Exhibit A at 17; Exhibit B at 13-14.

⁶ 47 U.S.C. § 309(f); 47 C.F.R. § 25.120(b)(1).

⁷ See *Stratos STA Request* at 3; *Telenor STA Request* at 3; *FTMSC STA Request* at 2; *MVS STA Request* at 5; *BT Americas STA Request* at 3.


⁸ While the Applicants claim that grant of the STA will permit public safety users time to familiarize themselves with the BGAN terminals prior to the beginning of hurricane season, Inmarsat already holds an experimental license to test and demonstrate BGAN terminals. Thus, Inmarsat already has the necessary authority to work with the public safety community to familiarize them with the terminals.

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Declaration of Jennifer A. Manner

1. I am the Vice President, Regulatory Affairs of Mobile Satellite Ventures Subsidiary LLC.
2. I have read the foregoing Consolidated Petition to Deny.
3. I have personal knowledge of the facts stated in the Consolidated Petition to Deny. The facts set forth in the Consolidated Petition to Deny, other than those of which official notice may be taken, are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.



Jennifer A. Manner

Executed on March 29, 2006

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Exhibit A

Mobile Satellite Ventures Subsidiary LLC, Petition to Hold in Abeyance MVS Application,
File No. SES-MFS-20051123-01634 (January 13, 2006)

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Exhibit B

Mobile Satellite Ventures Subsidiary LLC, Reply,
File No. SES-MFS-20051123-01634 (February 7, 2006)

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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 29th 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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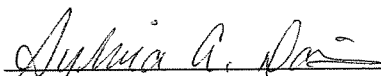
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