

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

In the matter of	)	
	)	
SkyWave Mobile Communications, Inc.	)	File No. SES-STA-20060511-00788
	)	
Stratos Communications, Inc.	)	File No. SES-STA-20060511-00790
	)	File No. SES-STA-20060511-00791
	)	File No. SES-STA-20060511-00792
	)	File No. SES-STA-20060511-00793
	)	File No. SES-STA-20060511-00794
	)	
Satamatics, Inc.	)	File No. SES-STA-20060511-00795
	)	
Telenor Satellite Inc.	)	File No. SES-STA-INTR2006-01261
	)	File No. SES-STA-INTR2006-01262
	)	File No. SES-STA-INTR2006-01263
	)	File No. SES-STA-INTR2006-01264
	)	File No. SES-STA-INTR2006-01265
	)	File No. SES-STA-INTR2006-01266
	)	File No. SES-STA-INTR2006-01267
	)	File No. SES-STA-INTR2006-01268
	)	File No. SES-STA-INTR2006-01269

**COMMENTS OF MOBILE SATELLITE VENTURES SUBSIDIARY LLC**

Mobile Satellite Ventures Subsidiary LLC (“MSV”) hereby files these Comments on the above-referenced applications filed by SkyWave Mobile Communications, Inc. (“SkyWave”), Stratos Communications, Inc. (“Stratos”), Satamatics, Inc. (“Satamatics”), and Telenor Satellite Inc. (“Telenor”) (collectively, the “Applicants”) for a second 60-day renewal of existing grants of Special Temporary Authority (“STA”) to operate earlier-generation mobile earth terminals using the uncoordinated Inmarsat 4F2 satellite at 52.75° W.L.<sup>1</sup> The STAs expire on May 19,

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<sup>1</sup> See SkyWave Mobile Communications, Inc., Request for Special Temporary Authority, File No. SES-STA-20060511-00788 (filed May 11, 2006) (“*SkyWave Application*”); Stratos Communications Inc., Request for Special Temporary Authority, File No. SES-STA-20060511-00790 et al (filed May 11, 2006) (“*Stratos Application*”); Satamatics, Inc., Request for Special

2006. MSV urges the Bureau to continue to apply the conditions imposed on the original STA grants for earlier-generation services as well as to (i) immediately require Inmarsat to cease its use of the loaned frequencies and (ii) establish an expiration date of June 30, 2006 for these STAs without Inmarsat having completed coordination of the Inmarsat 4F2 satellite with the United States.

The situation presented by these STA renewal requests is extraordinary because Inmarsat continues to refuse to return certain L-band frequencies that were loaned to it by MSV and MSV Canada. Inmarsat's refusal precludes MSV and MSV Canada from using these frequencies for their present systems and for testing and deploying their interim-generation and next-generation integrated satellite-terrestrial networks. Late last week, the Bureau took action prohibiting Inmarsat's illegal use of loaned frequencies for its Broadband Global Area Network ("BGAN") service using the uncoordinated Inmarsat 4F2 satellite.<sup>2</sup> MSV urges the Bureau to take the same action with respect to Inmarsat's earlier-generation services. While the Applicants filed reports almost three months ago pertaining to their possible use of loaned frequencies for earlier generation services, the Bureau has not yet acted to preclude Inmarsat from using the loaned frequencies for these services. These reports (to the extent they are publicly available) show that Inmarsat and the Applicants will not relinquish the loaned frequencies despite the harm that is being caused to MSV and MSV Canada. This harm is occurring now and is exacerbated by Inmarsat's and the Applicants' continued use of these frequencies. Inmarsat has had more than

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Temporary Authority, File No. SES-STA-20060511-00795 (filed May 11, 2006) ("*Satamatics Application*"); Telenor Satellite Inc., Request for Special Temporary Authority, File No. SES-STA-INTR2006-01261 et al (filed May 12, 2006) ("*Telenor Application*").

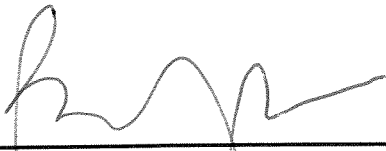
<sup>2</sup> See, e.g., Stratos Communications, Inc., Grant, File No. SES-STA-20060310-00419 (Call Sign 050249) (May 12, 2006), Condition No. 3.

sufficient notice that its usurpation of U.S.- and Canadian-coordinated frequencies will be coming to an end and that it should begin to transition customers to its own frequencies.

In light of the above, Telenor is simply wrong when it claims that operation of earlier-generation services with Inmarsat 4F2 pursuant to the STAs have not “adversely affected the interference environment” in the L band.<sup>3</sup> Accordingly, the Bureau should immediately require Inmarsat to cease its use of the loaned frequencies.

Moreover, MSV urges the Bureau to provide a clear expiration date of June 30, 2006 for these STAs unless Inmarsat has completed the coordination of the new and relocated Inmarsat satellites and services. If the Bureau continues to renew STAs for use of Inmarsat’s new satellite and services without insisting that it first complete coordination, there are no reasonable prospects that such coordination will ever be successfully completed.

Respectfully submitted,



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Dated: May 15, 2006

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<sup>3</sup> *Telenor Application* at 2.

## CERTIFICATE OF SERVICE

I, Julia Colish, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that on this 15th day of May 2006, served a true copy of the foregoing by first-class United States mail, postage prepaid, upon the following:

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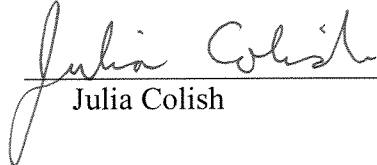
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