

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

_____)	
In the Matter of)	
)	File No. SES-STA-20060605-00092
)	
Deere & Company)	
Application for Special Temporary Authority to)	
Operate Receive-Only Mobile Earth Stations with)	
Inmarsat IIIIF4 at 142°)	
_____)	

REPLY COMMENTS OF APPLICANT

Deere & Company (“Deere”), by its attorneys, hereby files these Reply Comments in response to Comments filed by Mobile Satellite Ventures Subsidiary LLC (“MSV”) in the above captioned matter on June 6, 2006.¹ As set forth in greater detail below, Deere respectfully submits that MSV’s Comments pertain solely to the commercial use of the Inmarsat IIIIF4, and fail to raise any material issues that require additional International Bureau (“Bureau”) review prior to the grant of Special Temporary Authority (“STA”) for technical testing purposes requested by Deere.² Accordingly, Deere reiterates its request that the Bureau grant the aforementioned STA using its streamlined review process.

¹ See Comments of Mobile Satellite Ventures Subsidiary LLC, at 1, FCC File No. SES-STA-20060605-00922 (June 6, 2006) (“*MSV Comments*”).

² See Deere & Company, Application, File No. SES-STA-20060605-00922 (June 3, 2006) (“*Deere Application*”).

Introduction

Since 2001, Deere has equipped domestic agricultural equipment with its GreenStar™ precision farming system (“GreenStar™ system” or “GreenStar™”).³ This system uses transmissions from Global Positioning Satellites (“GPS”) and the Inmarsat geostationary satellite at 98° west longitude to help farmers pinpoint their locations. It helps to both improve domestic crop yields and reduce harmful soil pollution resulting from overfertilization. On June 3, 2006, Deere submitted an STA application to conduct receive-only testing using a downlink carrier from the Inmarsat IIF4 in order to test routine upgrades to hardware and software associated with the GreenStar™ system, but unrelated to the RF equipment. On June 6, 2006, MSV filed comments in response to the STA application “urg[ing] the [International] Bureau to make clear that (i) grant [of the STA] should not be construed as a Commission endorsement of Inmarsat’s failure to coordinate the Inmarsat IIF4 satellite at its new location with other L-band operators; and (ii) Inmarsat must coordinate the Inmarsat IIF4 with other L-band operators before Deere can provide commercial service in the United States with this satellite.”⁴

Discussion

The Bureau should reject the conditions that MSV seeks to impose upon Deere’s STA. The conditions proposed by MSV represent an improper and transparent attempt to involve Deere in an ongoing dispute between MSV and Inmarsat involving frequency coordination between their respective satellites. Furthermore, neither of the proposed conditions address issues related to the STA, or the STA’s underlying merits. Rejecting

³ See Deere & Company, FCC File No. SES-LIC-20010112-00051 (“*Deere License*”).

⁴ See *MSV Comments* at 1.

these conditions avoids entangling Deere in a longstanding dispute properly resolved in another forum.

The first condition sought by Inmarsat is a Bureau instruction that “make[s] clear that [an STA] grant should not be construed as Commission endorsement of Inmarsat’s failure to coordinate the Inmarsat IIF4 at its new location with other L-band operators.”⁵ This condition is totally unrelated to the merits of Deere’s STA application. Deere requested a short-term STA to conduct experimental testing on a non-interference only basis, not an endorsement of Inmarsat’s frequency coordination efforts. The Commission should reject this proposed condition both as a transparent attempt to involve Deere in the above referenced conflict, and as improper relief unrelated to the underlying application.

MSV also asks the Bureau to “explain that use of the Inmarsat IIF4 satellite for commercial service in the United States will not be permitted unless and until Inmarsat coordinates this satellite at its new location with other L-band operators.”⁶ Deere, however, has not requested use of the Inmarsat IIF4 for commercial service. Instead, Deere seeks the short-term use of a receive-only transmission from Inmarsat IIF4 to test improvements with no more than twenty (20) GreenStarTM systems nationwide.⁷ Thus, this proposed condition is also unrelated to the merits of Deere’s STA application and improper.

⁵ See *MSV Comments* at 4.

⁶ See *MSV Comments* at 4.

⁷ See Deere Corrected Supplemental Letter, File No. SES-STA-20060605-00922 (June 6, 2006) (“*Deere Supplemental Letter*”)

Conclusion

For the reasons stated above and in the pending STA application, Deere respectfully requests that the Bureau reject the conditions proposed by MSV, and expeditiously grant Deere's requested STA authority.

Respectfully submitted,



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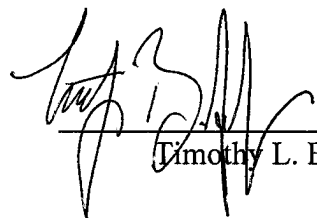
CERTIFICATE OF SERVICE

I, Timothy L. Bransford, hereby certify that on this 21st day of June, 2006, I caused to be served a true copy of the foregoing "Reply" by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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