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Satellite Division
International Bureau

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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Federal Communications Commission
Office of Secretary

In re: SkyWave Mobile Communications, Corp.)	File No. SES-STA-20060710-01131
)	
Stratos Communications, Inc.)	File No. SES-STA-20060710-01125
)	File No. SES-STA-20060710-01126
)	File No. SES-STA-20060710-01127
)	File No. SES-STA-20060710-01132
)	File No. SES-STA-INTR2006-01759
)	
Satamatics, Inc.)	File No. SES-STA-20060710-01130
)	
Telenor Satellite Inc.)	File No. SES-STA-20060705-01101
)	File No. SES-STA-20060705-01102
)	File No. SES-STA-20060705-01103
)	File No. SES-STA-20060705-01104
)	File No. SES-STA-20060705-01105
)	File No. SES-STA-20060705-01106
)	File No. SES-STA-20060705-01107
)	File No. SES-STA-20060705-01108

JOINT REPLY

Satamatics, Inc., SkyWave Mobile Communications, Corp., Stratos Communications, Inc. and Telenor Satellite Inc. (the "Licensees"), together with Inmarsat Ventures Limited ("Inmarsat"), reply to the comments of Mobile Satellite Ventures LLC ("MSV") on these requests to renew special temporary authority ("STA") to allow the continued provision of Inmarsat services using the Inmarsat-4 satellite at 53° W.L. ("I-4"). The Licensees have successfully provided service over I-4 pursuant to STA for approximately six months.

MSV does not oppose renewal of the STAs, nor does it claim that the transition of existing services – from an earlier generation Inmarsat spacecraft to I-4 – has adversely affected the interference environment. Indeed, by all accounts, the Licensees have fully complied with the conditions of their STAs, including the requirement that they operate on a non-harmful

interference basis. Thus, there is no reason these STAs should not be renewed on their existing terms, while the underlying applications for “full” authority remain pending.

Nevertheless, MSV asks the Commission to modify the conditions applicable to these authorizations to: (1) exclude from the STA renewals certain frequency bands that are the subject of an international dispute between Inmarsat and MSV (“Disputed Spectrum”); and (2) “establish a firm expiration date for these STAs” if Inmarsat and MSV have not entered a new international spectrum coordination agreement. The Licensees and Inmarsat already have fully responded to these requests by MSV in dozens of pleadings over last approximately nine months, including, but not limited to: (i) in earlier STA proceedings;¹ and (ii) in joint pleadings² opposing letter requests by MSV to exclude the Disputed Spectrum from existing authorizations and to impose conditions on pending applications.³ Because these issues have been fully briefed, and in the interest of conserving Commission resources, the Licensees and Inmarsat incorporate their earlier pleadings by reference for inclusion in the record here.

Inmarsat and the Licensees also respond to MSV’s statements related to the use of L-Band MSS by first responders, public safety officials and emergency relief workers. As Inmarsat and the Licensees have previously briefed, renewal of these STAs is essential to enable

¹ See, e.g., Reply of Inmarsat Ventures Limited, File Nos. SES-STA-20060511-00788 *et al.* (May 31, 2006); Joint Opposition of Satamatics, SkyWave and Stratos, SES-STA-20060511-00790 *et al.* (May 31, 2006).

² Joint Letter from the Licensees, Inmarsat *et al.* to Marlene H. Dortch, FCC, Call Signs E010011 *et al.* (Jul. 6, 2006) (responding to MSV’s letter request that the Commission exclude certain frequency bands from existing authorizations to provide Inmarsat services); Joint Letter from the Licensees, Inmarsat *et al.* to Marlene H. Dortch, FCC, File Nos. SES-MFS-20051122-01614 *et al.* (Jul. 6, 2006) (responding to MSV’s request to add three conditions to pending applications to communicate with I-4).

³ See also Opposition of Inmarsat, File No. SES-MFS-20060118-00050, *et al.* (Mar. 16, 2006) (responding to MSV’s Petition to Hold in Abeyance Telenor Satellite Inc.’s application to provide non-BGAN Inmarsat service over I-4).

the provision of public safety services *today*. Specifically, renewal is needed to ensure the continuity of service for a broad range of current users of Inmarsat services in the United States, including first responders and relief workers during the current hurricane season, as well as military and commercial customers.⁴ In contrast, the approximately dozen letters to which MSV refers in its Comments⁵ relate to something that is *years away* (at best) from fruition: the deployment of MSV's proposed hybrid ATC/MSS system that depends on a satellite not yet in orbit, and services that will not be available *until 2009, at the earliest*.

To be sure, a global rechannelization of the L-Band could benefit all L-Band operators, and Inmarsat invites MSV to engage in the Mexico City MOU process to facilitate a new L-Band channelization plan (as prescribed by Commission policy),⁶ which will then enable further coordination with affected operators in Europe and Asia. In the meantime, and consistent with a long line of Commission precedent,⁷ the Commission should decline MSV's request to impose conditions in this proceeding in order to improve MSV's leverage in the international spectrum coordination process.

⁴ Inmarsat disagrees with MSV's allegation that Inmarsat has not demonstrated a need for the Disputed Spectrum. Inmarsat did so within the framework of the Mexico City MOU, and, as Inmarsat has previously briefed, these types of disputes are appropriately resolved within the MOU framework. *See, e.g.,* Reply of Inmarsat Ventures Limited, File Nos. SES-STA-20060511-00788 *et al.* (filed May 31, 2006). Inmarsat also disagrees with MSV's mischaracterization of the history of Inmarsat's coordination efforts, which MSV itself has blocked. *See, e.g.,* Consolidated Response of Inmarsat, File No. SES-STA-20051216-01756, *et al.*, at 9 (filed Jan. 6, 2006).

⁵ *See* Comments of MSV at 2, 5, nn.3 & 10.

⁶ *FCC Hails Historic Agreement on International Satellite Coordination*, Report No. IN 96-16 (rel. Jun. 25, 1996).

⁷ *See Establishment of Policies and Service Rules for MSS in the 2 GHz Band*, 15 FCC Rcd 16127, 16192 ¶ 148-49 (2000); *SatCom Systems, Inc.*, 14 FCC Rcd 20798, 20813 ¶ 30 (1999); *Amendment of the Commission's Rules to Establish Rules and Policies Pertaining to MSS in the 1610-1626.5/2483.5-2500 MHz Frequency Bands*, 9 FCC Rcd 5936, 6018 ¶ 211 (1994); *AMSC Sub. Corp.*, 8 FCC Rcd 4040, 4043 ¶ 17 (1993).

For these reasons, the Licensees and Inmarsat urge the Bureau to extend the STAs without any new conditions.

Respectfully submitted,

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August 1, 2006

CERTIFICATE OF SERVICE

I, Jeffrey A. Marks, hereby certify that on this 1st day of August, 2006, I caused to be served a true copy of the foregoing "Joint Reply," by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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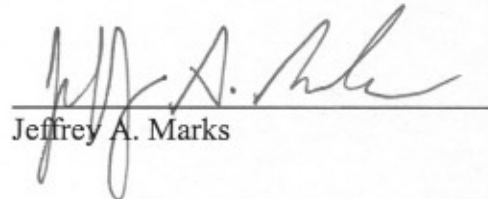
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