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**VIA HAND DELIVERY**

October 24, 2006

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
c/o 236 Massachusetts Avenue, N.E.  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

FILED/ACCEPTED

OCT 24 2006

Federal Communications Commission  
Office of the Secretary

WILLIAM K. COULTER  
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Re: FTMSC US, LLC; Response to MSV Comments  
File No. SES-STA-20061006-01820 (Call Sign E050284)

Dear Ms. Dortch:

FTMSC US, LLC ("FTMSC"), by its undersigned counsel, hereby responds to the Comments filed by Mobile Satellite Ventures Subsidiary LLC ("MSV"), dated October 13, 2006, in the above-referenced file number.<sup>1</sup> At the outset, FTMSC notes that MSV does not oppose a prompt grant of the underlying request which is the subject of its Comments, rather it simply asks for the clarification and incorporation of conditions imposed by the Federal Communications Commission ("Commission") on all other similarly situated Broadband Global Area Network ("BGAN") applicants.

First, in its Comments, MSV asks the Commission, upon grant of the new Special Temporary Authority ("STA") request by FTMSC ("New STA"),<sup>2</sup> to terminate the previous STA granted to FTMSC,<sup>3</sup> because they would be redundant.<sup>4</sup> However, the Commission should not

<sup>1</sup> Comments of Mobile Satellite Ventures Subsidiary LLC, File No. SES-STA-20061006-01820 (Call Sign E050284), dated October 13, 2006 ("MSV Comments").

<sup>2</sup> See Application of FTMSC US, LLC for Special Temporary Authority, File No. SES-STA-20061006-01820 (Call Sign E050284)(dated October 6, 2006)("FTMSC STA Application").

<sup>3</sup> STA of FTMSC, File No. SES-STA-20060314-00438, dated July 11, 2006 ("Prior STA").

<sup>4</sup> See MSV Comments at p. 2.

terminate the Prior STA until the proposed transaction transferring control of FTMSC is consummated. It is possible that there may be a lapse between when the new STA is issued and the proposed transaction transferring control of FTMSC can be consummated.<sup>5</sup> FTMSC hereby agrees to return the Prior STA immediately upon consummation of the proposed transaction transferring control of FTMSC to its new owners.

Second, MSV asks the Commission to recognize that the two STAs should not authorize double the number of terminals requested by each STA.<sup>6</sup> FTMSC confirms that it will not utilize both STAs concurrently and will not operate more than the number of terminals set forth in each STA separately.

Third, MSV argues that the Commission should adopt its proposed “clarified conditions” contained in its Petition for Clarification attached to the MSV Comments as Exhibit A.<sup>7</sup> FTMSC already responded to the issues raised by MSV in its Petition for Clarification and incorporated them in this docket.<sup>8</sup> Moreover, FTMSC is requesting the New STA only because of a proposed change of ownership, not to provide a new or different service, and will be returning the Prior STA. The New STA will simply “replace” the Prior STA. As indicated in its STA Application,<sup>9</sup> FTMSC agrees to comply with all of the conditions contained in its Prior STA, which are identical to the conditions contained in the STAs of all other authorized BGAN operators.<sup>10</sup>

Fourth and finally, MSV believes that the Commission should establish a firm expiration date of November 30, 2006 for the New STA, and provide that no further extensions will be granted.<sup>11</sup> The conditions of FTMSC’s Prior STA, and the New STA (assuming the same

<sup>5</sup> Under the proposed transaction, control of FTMSC will transfer from France Télécom S.A. to MobSat S.A.S. See Amendment of FTMSC US, LLC Application for Title III Authority, File No. SES-AMD-20060804-01315 (filed Aug. 4, 2006).

<sup>6</sup> See MSV Comments at p. 2.

<sup>7</sup> *Id.*

<sup>8</sup> Inmarsat Ventures Limited et. al., Joint Opposition to Petition for Clarification, File No. SES-STA-20060310-00419 et. al. (June 19, 2006).

<sup>9</sup> STA Application at 1.

<sup>10</sup> See Special Temporary Authority of MVS, File No. SES-STA-20060316-00454; Stratos, File No. SES-STA-20060310-00419; Telenor, File No. SES-STA-20060313-00430; and British Telecom, File No. SES-STA-20060315-00445.

<sup>11</sup> See MSV Comments at p. 4.



conditions will be adopted), allow the FCC to terminate it at any time.<sup>12</sup> Thus, there is no purpose to be served by establishing a new condition restricting the provision of services. However, if the Commission prefers, FTMSC does not oppose the New STA expiring on the same date as all other BGAN operator STAs, and is only asking that it be treated the same as all other BGAN operators.

Finally, we note that the MSV Comments are not new and were, in fact, incorporated by reference along with all responses in our STA requests. Thus, we will not respond to them again here.

Please file-stamp and return the extra copy of this filing in the pre-addressed, stamped envelope provided for this purpose. Kindly refer any questions or comments to the undersigned.

Regards,

A handwritten signature in black ink that reads 'William K. Coulter'.

William K. Coulter  
Counsel for FTMSC US, LLC

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<sup>12</sup> See Condition (8) to Prior STA, stating “[t]his STA may be terminated or modified at the International Bureau’s discretion, without a hearing, if conditions warrant.”

## CERTIFICATE OF SERVICE

I, Christine L. Zepka, hereby certify that on this 24th day of October, 2006, I caused to be served a true copy of the foregoing Response by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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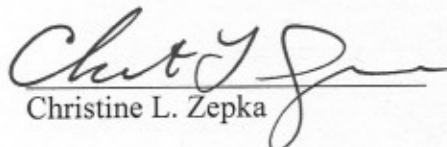
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