

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

In the matter of	)	
	)	
Amtech Systems LLC	)	File No. SES-STA-20061221-02206
	)	
Amtech Systems LLC	)	File No. SES-STA-20061221-02207

**OPPOSITION OF INMARSAT VENTURES LIMITED**

Inmarsat Ventures Limited (“Inmarsat”) opposes the Petition to Hold in Abeyance filed by Mobile Satellite Ventures Subsidiary LLC (“MSV”) in response to the above-captioned applications of Amtech Systems LLC (“Amtech”). In its applications, Amtech seeks special temporary authority (“STA”) to communicate with the Inmarsat 3F4 satellite located at 142° W.L. in order to ensure continuity of service in the event of a failure of MSV’s MSAT-2 satellite. Essentially, Amtech seeks authority to continue to provide already existing MSS services.

MSV offers nothing new in its Petition, but rather repeats its unsubstantiated concerns related to operation of Inmarsat 3F4 to which Inmarsat has fully responded on many prior occasions. In order to conserve Commission resources, rather than restating those responses here, Inmarsat incorporates its earlier pleadings by reference into this proceeding.<sup>1</sup>

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<sup>1</sup> See, e.g., Opposition of Inmarsat Ventures Limited, File Nos. SES-MFS-20060725-01253, SES-AMD-20060804-01310 (filed Sept. 21, 2006) (opposing MSV’s Petition to Hold in Abeyance an application filed by Telenor Satellite Inc. to communicate with Inmarsat 3F4); Letter from John P. Janka, Latham and Watkins LLP, to Marlene Dortch, FCC, File Nos. SES-MFS-20060725-01253, SES-AMD-20060804-01310 (filed Oct. 17, 2006) (same).

In addition, there is no basis for MSV's requests: (i) that Amtech precisely specify which L-Band frequency segments it intends to use; or (ii) that the Commission preclude Amtech's use of certain L-Band spectrum segments. As an initial matter, Amtech seeks only to use Inmarsat 3F4 in the event of an MSV satellite failure. If MSV's spacecraft fails, it is difficult to imagine how MSV could be adversely impacted by service being continued on another spacecraft. More fundamentally, requiring that Amtech specify in advance which band segments it would use in a future emergency (the failure of MSV's spacecraft) could very well defeat the purpose of getting this advance authority. Because of the dynamic way the L-Band is used, the bands that might be used today in a given geographic area or for a given service could be different than the bands that might be used in two months.

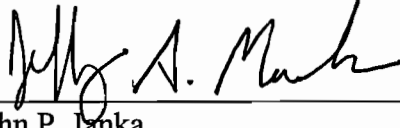
Moreover, as demonstrated in Inmarsat's prior pleadings, longstanding Commission precedent does not require applicants to specify which precise L-Band segments they intend to use, and provides for L-Band earth station licenses to be authorized subject to the results of coordination, and on a non-harmful-interference basis in the absence of a current spectrum sharing agreement.<sup>2</sup> The Commission thus should grant Amtech's applications without delay, subject only to the condition that Amtech operate on a non-harmful interference basis in the absence of a current L-Band spectrum sharing agreement.

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<sup>2</sup> See, e.g., Joint Letter from Inmarsat, *et al.* to Marlene H. Dortch, FCC, Call Signs E010011 *et al.* (filed Jul. 6, 2006); Joint Letter from Inmarsat, *et al.* to Marlene H. Dortch, FCC, File Nos. SES-MFS-20051122-01614 *et al.* (filed Jul. 6, 2006).

Respectfully submitted,



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January 5, 2007

## CERTIFICATE OF SERVICE

I, Jeffrey A. Marks, hereby certify that on this 5th day of January, 2007, I caused to be served a true copy of the foregoing by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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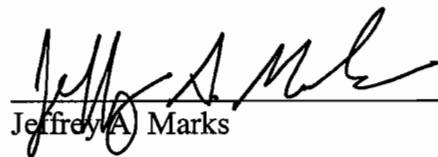
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