ORIGINAL

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

RESPONSE TO OPPOSITION TO MOTION FOR EXPEDITED CONSIDERATION

Amtech Systems LLC ("Amtech"), by its attorneys, urges the International Bureau to grant its requested 60-day special temporary authority ("STA") without further delay. As the Commission is aware, on December 21, 2006, Amtech submitted two applications seeking STA to permit Amtech's mobile data communications system to communicate with the Inmarsat 3F4 satellite located at 142° W.L. for a 60-day period. Amtech is authorized to communicate with the MSAT-1 and MSAT-2 satellites, but requested this STA so as to enhance its ability to offer back-up protection in the case of a satellite failure.

Pursuant to Section 25.120(b)(3) of the Commission's rules,[1] the Commission may grant a 60-day temporary authorization without placing the application on public notice or seeking public comment. Here, however, both Mobile Satellite Ventures Subsidiary LLC ("MSV") and Inmarsat Ventures Limited ("Inmarsat") already submitted pleadings regarding their ongoing L-band spectrum dispute.[2] Now, nearly 60 days after filing, Amtech's STA applications still are

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1 47 C.F.R. § 25.120(b)(3) (2006).

2 *See* Mobile Satellite Ventures Subsidiary LLC, Petition to Hold in Abeyance, File Nos. SES-STA-20061221-02206 and SES-STA-20061221-02207, filed December 22, 2006; Inmarsat Ventures Limited, Opposition of Inmarsat Ventures Limited, File Nos. SES-STA-20061221-02206 and SES-STA-20061221-02207, filed January

pending – imperiling redundancy in the event of emergency.

The FCC can, and should, grant Amtech's applications without resolving the broader dispute. L-band sharing has been fully briefed, and will be addressed, elsewhere[3] and Amtech understands that its authority may be conditioned on any eventual ruling. In the interim, requests for special and temporary authorization – especially those seeking path diversity – are processed in the ordinary course without being delayed by redundant filings.[4] Amtech therefore urges the Commission to grant its STA, as it has for similarly situated applicants who seek to provide traditional mobile satellite service using the Inmarsat satellites.[5]

5, 2007; Mobile Satellite Ventures Subsidiary LLC, Consent Motion for Extension of Time, File Nos. SES-STA-20061221-02206 and SES-STA-20061221-02207, filed January 10, 2007; Mobile Satellite Ventures Subsidiary LLC, Reply to Oppositions to Petition to Hold in Abeyance, File Nos. SES-STA-20061221-02206 and SES-STA-20061221-02207, filed February 1, 2007; Mobile Satellite Ventures Subsidiary LLC, Opposition to Motion for Expedited Consideration,, File Nos. SES-STA-20061221-02206 and SES-STA-20061221-02207, filed February 9, 2007.

[3] The spectrum dispute between MSV and Inmarsat is well documented, not only in the record here, but also in numerous other proceedings involving the L-band. *See, e.g.,* Telenor Satellite, Inc., File No. SES-MFS-20060725-01253; Stratos Communications, Inc., SES-LFS-20050826-01175; SkyWave Mobile Communications, Corp., File No. SES-STA-20051222-01788.

[4] Amtech soon will file an application to modify its underlying authority to add Inmarsat 3F4 as a point of communications. Thus, Section 25.120(b)(3) of the Commission's rules permits the International Bureau to grant the requested 60-day STA without resolving issues that otherwise might delay approval.

[5] *See* Stratos Communications, Inc., File No. SES-STA-20051216-01760 (Jan.18, 2006); Telenor Satellite, Inc., File No. SES-STA-20051216-01756 (Jan. 19, 2006); SkyWave Mobile Communications, Corp., File No. SES-STA-20051222-01788 (Jan. 18, 2006); Satamatics, Inc., File No. SES-STA-20051223-01790 (Jan. 18, 2006). *But see* Mobile Satellite Ventures Subsidiary LLC, Opposition to Motion for Expedited Consideration, File Nos. SES-STA-20061221-02206 and SES-STA-20061221-02207 at 3 (claiming that Amtech's traditional service should be treated like the new BGAN service).

Respectfully submitted,

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Dated: February 22, 2007

CERTIFICATE OF SERVICE

I, Pam Conley, do hereby certify that on February 6, 2007, I served a copy of Amtech Systems LLC's Response to Opposition to Motion for Expedited Consideration upon the following parties by U.S. first-class mail, postage pre-paid:

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