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## Via Hand Delivery

October 12, 2007

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary c/o Natek, Inc. 236 Massachusetts Avenue NE, Suite 110 Washington, DC 20002

Re:

Horizon Mobile Communications, Inc.

Supplement to Application for Special Temporary Authority

File No. SES-STA-20070112-00012

File No. SES-STA-INTR2007-00961 (Call Sign E070006)

Dear Ms. Dortch:

Enclosed please find five copies of a Supplement to the above-referenced pending request for Special Temporary Authority. The original (non-facsimile) copy of the Supplement will be filed at the Commission upon receipt by Lampert & O'Connor, P.C.

Should you have any questions concerning this matter, please contact E. Ashton Johnston or the undersigned at (202) 887-6230.

Very truly yours,

Helen E. Disenhaus

Counsel to Horizon Mobile Communications, Inc.

Helen & Deserbois

cc w/encl:

Roderick Porter (Roderick Porter of fcc.gov)

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## HORIZON MOBILE COMMUNICATIONS, INC. 2250 Skyview Lane Harleysville, PA 19038

October 11, 2007

Marlene Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, N.W. Washington, DC 20554

Re:

Horizon Mobile Communications, Inc.
Supplement to Application for Special Temporary Authority
File No. SES-STA-20070112-00012
File No. SES-STA-INTR2007-00961 (Call Sign E070006)

Dear Ms. Dortch:

Horizon Mobile Communications, Inc. ("Horizon") hereby supplements its above-referenced pending request for Special Temporary Authority ("STA") to provide Broadband Global Area Network ("BGAN") service in the United States. This Supplement provides additional information demonstrating the important, immediate public interest benefits that will be achieved by a prompt grant of the requested STA.

Supplementing the information provided in the STA as previously filed, Horizon provides the following additional information:

- 1. Horizon acknowledges that grant of the requested STA will be subject to the same terms and conditions previously applied to the requests for STA to offer BGAN service in the United States that have already been granted.<sup>1</sup>
- 2. For national security and national emergency reasons, it is important that Horizon's BGAN service be available to both military and civilian users. Under its Continuity of Operations Plan (COOP) mandate, the Commission is charged with ensuring that first responders and other public safety personnel have available to them the full range of communications resources and tools that will allow them to perform their

See, e.g., Satellite Communications Services Information re: Actions Taken, Public Notice, Report No. SES-00835 (July 5, 2006) at 3 (reporting grant with conditions of STA request of Thrane & Thrane Airtime LTD., File No. SES-STA-20060522-00857).

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duties safely and effectively.<sup>2</sup> Satellite communications play an important role in this effort.<sup>3</sup> Horizon and its parent company and affiliates (collectively, the "SatCom Group") are United States Government-accredited suppliers of satellite communications services. Our experience in tailoring service for coastal and offshore applications that must function during severe weather events provides important benefits to users. Our customers include both the State of Louisiana and the Louis Armstrong New Orleans International Airport (the "Airport"), which is owned and operated by the City of New Orleans. The importance of communications services to these customers, particularly during weather-related emergencies and their aftermath, cannot be overstated.

- the State of Louisiana, helping to maintain vital communications links during the hurricane season, which has two more months to run this year. Upon grant of the requested STA, Horizon will be able to offer the State the additional benefits of the portable, higher-speed BGAN service. The State of Louisiana selected us for our satellite service needs particularly because of our unique expertise in supplying integrated communications services, and our ability to offer a wide range of equipment for use on both land and sea. The Gulf region's recent hurricane experience demonstrated why access to the service capabilities high-speed BGAN service can offer would be essential to any future disaster relief effort. It is in the public interest for public safety personnel to be able to obtain BGAN service from a provider with special knowledge of the coastal environment.
- 4. The Sat Com Group's contract with the Airport includes the provision of high-speed broadband data transmissions via satellite for use during emergency situations, both natural and man-made. As has been well-documented, in such situations many land-based communications services, whether wireline or wireless, have suffered severe outages, sometimes extending for many days and weeks. For two days after Hurricane Katrina struck, in New Orleans many telephones, and virtually all mobile phones, were out of service in the area as a result of wind and water damage to communications infrastructure and power sources, and many outages lasted far longer. Internet access was severely disrupted. For many providers of emergency services, satellite-based communications provided their only link. The Airport closed before the storm and remained closed to regular passenger service for two weeks, and could not

<sup>&</sup>lt;sup>2</sup> "A primary goal of the [Commission's Public Safety & Homeland Security] Bureau is to support and advance initiatives that further strengthen and enhance the security and reliability of the nation's communications infrastructure and public safety and emergency response capabilities that will better enable the FCC to assist the public, first responders, law enforcement, hospitals, the communications industry and all levels of government in the event of a natural disaster, pandemic or terrorist attack."

<a href="http://www.fcc.gov/pshs/aboutus.html">http://www.fcc.gov/pshs/aboutus.html</a>. See also Presidential Decision Directive 63 (May 22, 1998) (protection of infrastructure from intentional acts).

<sup>&</sup>lt;sup>3</sup> See http://www.fcc.gov/pshs/clcaringhouse/satellite.html.

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resume full operations for one month. During that time, it became a headquarters for rescue and humanitarian efforts. The Airport became the home of some 25,000 people for seven days, and even became a makeshift hospital. Particularly in such emergency situations, it is critical that the Airport have access to all forms of advanced communications services, including the portable, high speed broadband service that Horizon can provide through the BGAN service.

This year, as in many years, the U.S., particularly in the Western part of 5. the country, has experienced devastating forest fires that have cost many lives and have caused huge losses to forest resources and commercial and residential property. By permitting Horizon to offer BGAN service in the United States, the Commission will allow Horizon to offer forestry industry customers an important new capability to fight deadly forest fires, potentially helping to save many lives and millions of dollars in property damage. Unlike other communications services, BGAN service provides a high-speed broadband transmission path that can carry voice and data traffic simultaneously via highly portable terminals. When firefighters are risking their lives to bring a firestorm under control, it is imperative that they have immediately available to them the ability to contact potential rescue parties, obtain the latest wind and weather information, and communicate to other firefighters and control centers the details of local conditions visually, orally, and in writing. Grant of the requested STA will allow the forestry industry to take advantage of the substantial advances offered by BGAN service and will give them an important new tool in critical disaster situations as well as in conducting their business operations.

Grant of the requested STA will permit Horizon to offer these and other users described in the STA Request the high speed satellite broadband services they require for the most effective response to natural disaster and national security emergencies. Horizon's experience will enable it to deliver BGAN solutions tailored to the needs of coastal public agencies and emergency relief personnel. The Commission should promptly grant the STA and allow Horizon to expand the communications services available to first responders and others.

Respectfully submitted,

Adam Thompson

President,

Horizon Mobile Communications, Inc.

cc: Roderick Porter, Deputy Chief, International Bureau
Gardner Foster, Legal Advisor, International Bureau
Scott Kottler, Chief, Systems Analysis Branch, Satellite Division
Steve Duall, Policy Branch, Satellite Division