

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

In the matter of)	
)	
SkyWave Mobile Communications, Inc.)	SES-STA-20071109-01554
)	
Stratos Communications, Inc.)	SES-STA-20071101-01489
)	SES-STA-20071101-01490
)	SES-STA-20071101-01491
)	SES-STA-20071101-01492
)	SES-STA-20071101-01493
)	
)	
Vizada Satellite, Inc.)	SES-STA-20071101-01519
)	SES-STA-20071101-01514
)	SES-STA-20071101-01513
)	SES-STA-20071101-01516
)	SES-STA-20071101-01517
)	SES-STA-20071101-01515
)	SES-STA-20071101-01518

JOINT RESPONSE

Skywave Mobile Communications, Inc., Stratos Communications Inc., and Vizada Satellite, Inc. (together, the "Licensees") and Inmarsat Ventures Limited ("Inmarsat") respond to the comments of Mobile Satellite Ventures LLC ("MSV") on these requests for special temporary authority ("STA") to continue provision of longstanding Inmarsat services using the Inmarsat-4 satellite at the nominal 53° W.L. orbital location ("I-4").

MSV does not oppose grant of the STAs, nor does it claim that the transition of longstanding services from an earlier generation Inmarsat spacecraft to I-4 has adversely affected the interference environment. Indeed, by all accounts, each Licensee has fully complied with the conditions of its STA, including the requirement that it operate on a non-harmful interference

basis. Thus there is no reason that the Commission should not renew these STAs to provide Inmarsat services pursuant to the terms on which the Licensees have been providing these services while their underlying applications for “full” authority remain pending.

Nevertheless, MSV suggests that the Commission modify the condition applicable to the Licensees’ STAs 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 have already fully responded to these suggestions of MSV on multiple occasions, including, but not limited to: (i) in earlier STA proceedings;¹ and (ii) in joint pleadings² opposing requests by MSV to exclude the Disputed Spectrum from existing authorizations and to impose conditions in granting 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.

¹ See, e.g., Joint Reply, File Nos. SES-STA-20060710-01131 *et al.* (Aug. 1, 2006); Reply of Inmarsat Ventures Limited, File Nos. SES-STA-20060511-00788 *et al.* (May 31, 2006) ; Joint Opposition, SES-STA-20060511-00790 *et al.* (May 31, 2006).

² Joint Letter 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 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).

For these reasons, the Licensees and Inmarsat urge the Bureau to grant the requested STAs subject only to the conditions pursuant to which the Licensees currently provide Inmarsat services.

Respectfully submitted,

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November 28, 2007

CERTIFICATE OF SERVICE

I, Amber Powelson, hereby certify that on this 28th day of November, 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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