

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

In the matter of)	
)	
Amtech Systems LLC)	File No. SES-STA-20071129-01630
)	
Amtech Systems LLC)	File No. SES-STA-20071129-01633
)	

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 provide 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.¹

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

¹ 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).

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.² 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.

² See, e.g., Joint Letter from Inmarsat, *et al.* to Marlene H. Dortch, FCC, Call Signs EC10011 *et al.* (filed Jul. 6, 2006); Joint Letter from Inmarsat, *et al.* to Marlene Dortch, FCC, File Nos. SES-MFS-20051122-01614 *et al.* (filed Jul. 6, 2006).

Respectfully submitted,



Diane J. Cornell
Vice President, Government Affairs
INMARSAT, INC.
1101 Connecticut Avenue, N.W.
Suite 1200
Washington, D.C. 20036
Telephone: (202) 248-5155

December 19, 2007

CERTIFICATE OF SERVICE

I, Amber Powelson, hereby certify that on this 19th day of December, 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:

Helen Domenici*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Andrea Kelley*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

James Ball*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Scott Kotler*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Howard Griboff*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Karl Kensinger*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Cassandra Thomas*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Gardner Foster*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Roderick Porter*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Kathryn Medley*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Fern Jarmulnek*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

JoAnn Ekblad*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Stephen Duall*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Bruce D. Jacobs
Tony Lin
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, N.W.
Washington, DC 20037-1128

Barbara Beam
Amtech Systems LLC
8158 Adams Drive
Suite 200
Hummelstown, PA 17036

Robert Nelson*
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Jennifer Hindin
Chin Yoo
Wiley Rein & Fielding LLP
1776 K Street, NW
Washington, D.C. 20006

Jennifer A. Manner
Vice President, Regulatory Affairs
Mobile Satellite Ventures Subsidiary LLC
1002 Park Ridge Boulevard
Reston, Virginia 20191

**Via Electronic Mail*


Amber Powelson