

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
2018 Biennial Review of Telecommunications Regulations	)	IB Docket No. 18-377
	)	
Revision or Elimination of Rules Under the Regulatory Flexibility Act, 5 U.S.C. § 610	)	CB Docket No. BO 18-31
	)	
2016 Biennial Review of Telecommunications Regulations	)	IB Docket No. 16-131
	)	

To: Federal Communications Commission

**REPLY COMMENTS OF IRIDIUM COMMUNICATIONS INC.**

**I. INTRODUCTION**

Iridium Communications Inc. (“Iridium”) hereby responds to the comments filed by Ligado Networks LLC (“Ligado”) on Iridium’s proposal that the Federal Communications Commission (“FCC” or “Commission”) eliminate its Ancillary Terrestrial Component rules (“ATC”).<sup>1</sup> Although Ligado attempts to justify the continued existence of the ATC rules, it fails to provide any substantive legal or policy support for this proposition and makes a number of misleading statements along the way.

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<sup>1</sup> Reply Comments of Ligado Networks LLC, IB Docket No. 16-131, CB Docket No. BO 18-31 (filed Jan. 23, 2019) (“Ligado Reply”); Comments of Iridium Communications Inc., IB Docket No. 16-131, CB Docket No. BO 18-31, (filed Oct. 29, 2018) (“Iridium Comment”).