

services. Such rules need not, and indeed cannot, be developed, however, until after the Commission determines the extent to which the multilateral efforts described above are successful in establishing regulatory parity for global MSS, and hence the extent to which such “downstream” regulations are even necessary.

IX. ICO SHOULD BE TREATED LIKE ANY OTHER PRIVATE COMPANY

The Commission raises a number of concerns regarding the possible anticompetitive advantages that intergovernmental organization (“IGO”) affiliates might enjoy, including privileged access to national markets.⁶⁴ As a private, independent company, ICO enjoys no market access privileges as a result of its early origins as an Inmarsat project. ICO therefore, merits the same regulatory treatment as any other market-driven entrepreneurial entity operating as a commercial company under commercial law. Accordingly, for the reasons provided below, ICO requests that the FCC declare ICO to be a private entity, rather than an IGO affiliate.

Alternatively, should the FCC nevertheless decide to regulate ICO as an IGO affiliate, the Commission should still treat ICO like any other non-U.S.-licensed system seeking access to the U.S. market. To this end, the Commission should adopt its proposal to treat IGO affiliates like any other non-U.S.-licensed satellite system seeking to serve the U.S.⁶⁵

A. ICO Is A Private Company And Should Not Be Deemed An IGO Affiliate

In September of 1994, the Inmarsat Council decided to create a separate affiliated company, known then as Inmarsat-P, to be established with the objective of implementing a global MSS system. Since then, Inmarsat-P has evolved into ICO, with its own corporate

⁶⁴ See NPRM at ¶ 66.

⁶⁵ See *id.* at ¶ 73.

identity and pro-competitive business philosophy. Inmarsat's current role in ICO is simply that of an investor.⁶⁶

Although ICO had its origins in an Inmarsat project, today ICO is a private, commercial, market-driven entity that is constitutionally, managerially and operationally an entirely separate entity from Inmarsat. ICO is an autonomous company with a board of directors whose fiduciary duty runs solely to ICO's shareholders. Although ICO's list of investors includes Inmarsat members, these investors are participating in ICO outside of their signatory roles and have independently determined their level of investment and their investment vehicles. Some have invested in ICO through their signatory entities, whereas others have participated through separate affiliates, separate subsidiaries, or, in one instance, a syndicated investment.⁶⁷ Other Inmarsat signatories have chosen to invest in other Big LEOs or not at all.⁶⁸

Furthermore, non-Inmarsat members currently participate in ICO as investor-partners, wholesalers, and syndicated partners. Most recently, for example, NEC joined ICO as a strategic partner through an equity investment in ICO. NEC, along with a consortium of companies that includes Hughes Network Systems and Ericsson, also will deliver ICO's ground systems equipment under a contract estimated at approximately \$500 million. Hughes joined ICO in 1995 as a strategic partner and has a \$2.3 billion contract to build and launch ICO's space segment. In addition, ICO is considering potential scenarios for increasing the level of ICO ownership by non-Inmarsat member entities.

⁶⁶ Inmarsat's total economic ownership in ICO is approximately 10.6 percent. So long as its ownership level stays above 10 percent, Inmarsat will have a 15 percent voting right in annual general meetings and the right to appoint two directors to ICO's thirteen-member board.

⁶⁷ KDD, one of the competing facilities-based operators of international services in Japan, has invested in ICO through a consortium, Satellite Phone Japan.

⁶⁸ See Exhibit A.

As a private company, ICO enjoys no governmental privileges and immunities whatsoever. ICO's relationships with Inmarsat and other investors convey no automatic rights to market access for ICO. In most of the large countries or groups of countries where ICO will operate, including China, the European Union, India and Russia, the entity that will make regulatory decisions concerning market access is entirely separate from the operational entities that are ICO investors. As a result, ICO expects to compete vigorously on an equal footing with its competitors to secure the full range of licenses and service provider relationships in markets around the world. An examination of the MSS experience thus far demonstrates that ICO's competitors have had as much success as ICO in securing service agreements and strong partners in international markets.⁶⁹

Recognizing the issues related to its history with Inmarsat, ICO has undertaken extraordinary efforts to accommodate Executive Branch concerns regarding this matter. At its most recent Annual General Meeting in May of this year, the ICO board voted to incorporate the Inmarsat Principles into ICO's organic documents, as requested by the U.S. Executive Branch. The Principles, which prohibit ICO from engaging in anticompetitive conduct with respect to its ties to Inmarsat, should adequately address any FCC concerns regarding ICO's independence from Inmarsat.⁷⁰

⁶⁹ For example, Teleglobe has committed to invest in Odyssey; France Telecom is an Iridium investor.

⁷⁰ The Inmarsat Principles include the principles set forth in paragraph C.1 of the *Report of the Tenth (Extraordinary) Session of the Inmarsat Assembly* (Dec. 13, 1994) and the principles and recommendations of the Intersessional Working Group and the responses of the Inmarsat Council thereto referenced in paragraph C.2 of the Report. The Inmarsat Principles, as incorporated by ICO into its organic documents, among other things, (1) commit the company to broad and open ownership; (2) prohibit cross-subsidization between Inmarsat and ICO; and (3) endorse non-discriminatory access to national markets for all mobile satellite communications networks, subject to spectrum coordination and availability.

B. Alternatively, The Commission Should Treat IGO Affiliates Like Any Other Non-U.S.-licensed Operator Seeking Access To The U.S. Market

If the Commission decides that ICO should be regulated as an IGO affiliate, rather than as a private company, the FCC should adopt its proposal to treat IGO affiliates like any other non-U.S.-licensed satellite system seeking to serve the United States. As stated in the NPRM, the Commission's general approach to IGO affiliates is "that genuinely procompetitive privatization should result in a commensurate reduction in the burdens that go with intergovernmental status."⁷¹ The formation of ICO was most certainly a "genuinely procompetitive privatization." By treating IGO affiliates as private operators, the Commission will appropriately encourage further privatization in the international satellite marketplace by creating a presumption that IGO affiliates are competitive companies that need not overcome regulatory burdens not placed on other private satellite operators

CONCLUSION

For the reasons stated above, ICO urges the Commission not to impede the development of competitive global MSS by adopting a "critical mass" ECO-Sat test. As proposed for U.S. earth station applicants seeking to provide MSS via non-U.S.-licensed MSS systems, a "critical mass" test would unreasonably discriminate against non-U.S.-licensed systems, and would be ineffectual in promoting the pro-competitive goals motivating the Commission's proposals in this proceeding.

Instead, ICO encourages the FCC to adopt a multilateral approach to global MSS that recognizes the international nature of these services. To help ensure regulatory parity and open,

⁷¹ See NPRM at ¶ 73.

non-discriminatory access for these services, the Commission should encourage other notifying administrations to adopt a "no special concessions" condition for their authorized MSS space segment operators. This approach will help establish a level playing field for all global MSS operators, thereby serving the public interest by allowing consumers to enjoy the benefits of a vigorous, competitive global MSS market.

Respectfully submitted,

By: 

Consultants:

COMPASSROSE INTERNATIONAL, INC.
1200 19th Street, N.W.
Suite 560
Washington, D.C. 20036

PUTNAM, HAYES & BARTLETT LIMITED
Lansdowne House
Berkeley Square
London W1X 5DH

Cheryl A. Tritt
Susan H. Crandall
Stephen J. Kim
MORRISON & FOERSTER, LLP
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006
(202) 887-1500

Attorneys for ICO Global
Communications

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GLOBAL MSS OPERATORS' SPHERES OF INFLUENCE¹ IN LARGE MARKETS²

Country	Sphere of Influence			
	ICO	Iridium	Globalstar ³	Odyssey
United States	[4]	Yes	Yes	Yes
Japan	Yes	Yes		
Germany	Yes	Yes	Yes	
France			Yes	
Italy		Yes	[5]	
UK	Yes	Yes	Yes	Yes
Canada		Yes		Yes
Brazil		Yes ⁶	Yes ⁶	
Spain	Yes			
China	Yes	Yes		
Mexico	Yes	Yes	Yes	
Korea	Yes	Yes	Yes	
Russian Federation	Yes	Yes	Yes	
Netherlands	Yes		Yes	
Australia	Yes	Yes	Yes	
Argentina	Yes	Yes	Yes	
India	Yes	Yes	Yes	
Switzerland	Yes			
Belgium			Yes	
Sweden	Yes		Yes	
Austria				
Turkey	Yes			
Indonesia	Yes	Yes	Yes	
Denmark				
Thailand	Yes	Yes		
Saudi Arabia	Yes	[7]		
South Africa	Yes		Yes	
Hong Kong		Yes	Yes	
Ukraine	Yes			
Norway				
Poland	Yes	Yes	Yes	
Portugal	Yes	Yes	Yes	
Finland	Yes			
Greece	Yes	Yes	Yes	
Israel	Yes		Yes	
Malaysia	Yes	Yes		

¹ "Sphere of influence" includes countries in which an existing global MSS operator has (1) investors who are currently basic or mobile telecommunications service operators in that country; (2) service providers who are currently basic or mobile telecommunications service operators in that country; or (3) investors or service providers that have equity interests of more than 20% in basic or mobile telecommunications service operators in that country. "Investor" includes any entity that (1) holds a direct equity interest in an existing MSS operator; (2) wholly owns a subsidiary that holds a direct equity interest in an existing MSS operator; or (3) holds a direct equity interest in an entity whose sole purpose is to hold and manage a direct equity interest in an existing MSS operator. (Basic or mobile telecommunications service operators do not include organizations such as Comsat in the U.S. or Morsviacspuznik in Russia, whose main business is participation in international satellite consortia). The information provided herein has been compiled entirely from publicly available sources. ICO does not guarantee the accuracy or completeness of the information.

² "Large markets" are countries with a GDP in excess of \$60Bn in 1993. Countries are listed in descending order, according to their GDP. ICO in no way intends to suggest that the countries listed are of any relevance to any test -- including a critical mass test -- that the Commission is considering.

³ According to Globalstar press releases, Globalstar has signed agreements for service providers in more than 90 countries.

⁴ While ICO, unlike any other global MSS operators, currently lacks a U.S. license, two of its investors are U.S. based companies, Hughes and Comsat.

⁵ Alenia Spazio, Italy's largest aerospace company, is a Globalstar strategic partner and major satellite subcontractor.

⁶ Telebras, the monopoly PTO, will provide the gateway for all existing MSS operators. Only Globalstar and Iridium, however, have local partners in Brazil.

⁷ Two major Saudi Arabian companies, Mawarid Overseas Company and the Saudi Binladin Group, formed Iridium Middle East Corporation. Mawarid also formed Iridium Africa and has two Directors on Iridium's Board.

**SPHERES OF INFLUENCE¹ OF ICO INVESTORS
IN LARGE MARKETS²**

Country	Nature of sphere of influence
USA	Comsat and Hughes are investors in ICO.
Japan	<p>KDD, an international telecommunications provider in Japan, has a substantial shareholding in Satellite Phone Japan, a new consortium established to invest in ICO. KDD is one of three competing facilities-based operators of international services in Japan.</p> <p>NEC is an ICO strategic partner and leads a consortium to deliver ICO ground systems equipment.</p>
Germany	DeTeMobil, an investor in ICO, is a cellular operator in Germany, and is a subsidiary of Deutsche Telekom, the incumbent fixed service telecommunications operator in Germany. There are three cellular operators in Germany, including DeTeMobil.
UK	<p>Telstra, an investor in ICO, is a resale carrier in the UK and delivers international traffic for large UK multi-nationals.</p> <p>Singapore Telecom, an investor in ICO, has a 50% shareholding in Yorkshire Cable, a regional cable telephony operator. Singtel has announced that it plans to sell this stake to General Cable.</p>
Spain	Telefonica de Espana, an investor in ICO, is the supplier of fixed telecommunications services in Spain.

¹ "Sphere of influence" includes countries in which ICO has (1) investors who are currently basic or mobile telecommunications service operators in that country; (2) service providers who are currently basic or mobile telecommunications service operators in that country; or (3) investors or service providers that have equity interests of more than 20% in basic or mobile telecommunications service operators in that country. "Investor" includes any entity that (1) holds a direct equity interest in ICO; (2) wholly owns a subsidiary that holds a direct equity interest in ICO; or (3) holds a direct equity interest in an entity whose sole purpose is to hold and manage a direct equity interest in ICO. (Basic or mobile telecommunications service operators do not include organizations such as Comsat in the U.S. or Morsviazputnik in Russia, whose main business is participation in international satellite consortia). The information provided herein concerning the direct investors in ICO, as well as the non-ICO interests of ICO investors, has been compiled entirely from publicly available sources. ICO does not guarantee the accuracy or completeness of information concerning the non-ICO interests of ICO investors.

² "Large markets" are countries with a GDP in excess of \$60Bn in 1993. Countries are listed in descending order, according to their GDP. ICO in no way intends to suggest that the countries listed are of any relevance to any test -- including a critical mass test -- that the Commission is considering.

EXHIBIT A

Country	Name of parent of investor
China	<p>China Mobile Satellite Communications Company is an investor in ICO. This investor is jointly owned by Beijing Marine Communications and Navigation Company (MCN) and China Telecom. China Telecom is a fixed telecommunications operator in China.</p> <p>Singapore Telecom, an investor in ICO, has a 49% stake in Suzhou Zhong Xing Telecom, a regional cellular operator.</p>
Mexico	<p>Telecomunicaciones de Mexico, an ICO investor, operates satellite, telex and telegraph services in Mexico.</p> <p>Telefonica de Espana, an investor in ICO, has a 24.5% shareholding in Unicom, a long distance telecommunications operator.</p>
Korea	<p>Project21 Korea, an ICO investor, is owned by Korea Telecom, the supplier of local and trunk telecommunications services, and is one of two suppliers of international telecommunications services in Korea.</p>
Russian Federation	<p>DeTeMobil, an investor in ICO, has a 39% shareholding in Mobil TeleSystems, which operates a digital cellular network in Moscow, and a 48.5% shareholding in Russkaya Telefinnaya Kompaniya (RTK), a Russian cellular phone group.</p>
Netherlands	<p>PTT Telecom Netherlands, an investor in ICO, is the incumbent telecommunications operator in the Netherlands. Cellular services are provided competitively in the Netherlands.</p>
Australia	<p>Telstra European Holdings Ltd., an investor in ICO, is a subsidiary of Telstra, one of the two competing fixed service telephone companies in Australia, and one of three cellular operators.</p>
Argentina	<p>COMSAT Argentina SA, an international satellite services operator, is an investor in ICO.</p> <p>Telefonica de Espana, an investor in ICO, has a 22% shareholding in Telefonica Argentina, a regional telecommunications operator.</p>
India	<p>Videsh Sanchar Nigam Ltd. (VSNL), an investor in ICO, is the supplier of international telecommunications services in India.</p>
Switzerland	<p>PTT Suisse, the national telecommunications operator in Switzerland, is an investor in ICO.</p>
Sweden	<p>Telecom Finland, an investor in ICO, is one of several competing operators of basic fixed telecommunications services in Sweden.</p>
Turkey	<p>Turk Telekomunikasyon is an investor in ICO, and is the national operator of fixed telecommunications services in Turkey.</p>

EXHIBIT A

Country	Primary provider of services
Indonesia	PT Indosat, an investor in ICO, is the largest provider of basic international services in Indonesia.
Thailand	CS Communications, an investor in ICO, is 49% owned by Communications Authority of Thailand, the supplier of international services in Thailand.
Saudi Arabia	The Saudi Arabian Ministry of Posts, Telegraphs and Telephones is an investor in ICO, and is the provider of fixed and cellular services in Saudi Arabia.
South Africa	Telecom SA Ltd., an investor in ICO, is the supplier of fixed telecommunications services in South Africa. Cellular services are provided competitively.
Ukraine	<p>PTT Netherlands, an ICO investor, and Deutsche Telekom, parent of ICO investor DeTeMobil, between them have a 32% stake in Ukraine Mobile Communications, a national cellular operator. These companies also have between them a 29.5% shareholding in Ukrainian Telecommunications (UTEL), a joint venture to expand and upgrade Ukraine's fixed telecommunications network.</p> <p>OTE, an investor in ICO, and Hughes Network Systems, an affiliate of Hughes Electronics Corporation, an ICO investor, are members of the Ukrainian Wave consortium, a consortium of western and local firms which is contracted to install and manage the telecommunications network of western Ukraine.</p>
Poland	Telekomunikacja Polska SA, an investor in ICO, is the supplier of fixed telecommunications services in Poland.
Portugal	Portugal Telecom, an investor in ICO, is the supplier of fixed telecommunications services and is one of the two cellular operators in Portugal. It supplies international services jointly with Companhia Portugesa Radio Marconi, its subsidiary.
Finland	Telecom Finland, an investor in ICO, is a provider of local, long distance and international fixed services in Finland. It faces competition in all these businesses.
Greece	Hellenic Telecommunications Organisation (OTE), an investor in ICO, is the supplier of fixed telecommunications services in Greece.
Israel	The Israeli Ministry of Communications is an investor in ICO and is the owner of Bezeq, the supplier of fixed telecommunications services in Israel.
Malaysia	Telecom Malaysia Berhad, an investor in ICO, provides fixed and cellular telecommunications services in Malaysia.

**SPHERES OF INFLUENCE¹ OF IRIDIUM
INVESTORS IN LARGE MARKETS²**

Country	Nature of sphere of influence
United States	Iridium has a license to operate in the United States.
Japan	DDI is a founder member of Nippon Iridium Corporation (NIC), Iridium's Japanese investor. DDI is a leading telecommunications operator in Japan, providing cellular and long distance services. NIC's investors include at least seven other Japanese cellular companies.
Germany	Vebacom, an Iridium investor, offers a wide variety of telecommunications services including mobile services. Fifty-five percent of Vebacom is held by VEBA AG, the fourth largest corporation in Germany. Cable & Wireless holds the remaining 45%.
Italy	STET, a shareholder in Iridium, is a holding company in Italy, which owns and controls Telecom Italia, the national fixed telecommunications operator, and the larger of the two cellular operators.
UK	BCE Inc. is founder member of Iridium Canada, Inc., an Iridium shareholder, through BCE Mobile Communications, Inc. and BCE Telecom International. BCE Inc., through its subsidiary Bell Canada, owns 20% of Mercury Communications, a major fixed service provider, and 42% of Bell Cable media, the third largest UK cable television operator, which also has a cable telephony license.
Canada	BCE Mobile Communications, Inc. and BCE Telecom International are investors in Iridium through Iridium Canada, Inc. BCE Inc. is the holding company for Bell Canada.

¹ "Sphere of influence" includes countries in which Iridium has (1) investors who are currently basic or mobile telecommunications service operators in that country; (2) service providers who are currently basic or mobile telecommunications service operators in that country; or (3) investors or service providers that have equity interests of more than 20% in basic or mobile telecommunications service operators in that country. "Investor" includes any entity that (1) holds a direct equity interest in Iridium; (2) wholly owns a subsidiary that holds a direct equity interest in Iridium; or (3) holds a direct equity interest in an entity whose sole purpose is to hold and manage a direct equity interest in Iridium. (Basic or mobile telecommunications service operators do not include organizations such as Comsat in the U.S. or Morsviazspudnik in Russia, whose main business is participation in international satellite consortia). The information provided herein has been compiled entirely from publicly available sources. ICO does not guarantee the accuracy or completeness of the information.

² "Large markets" are countries with a GDP in excess of \$60Bn in 1993. Countries are listed in descending order, according to their GDP. ICO in no way intends to suggest that the countries listed are of any relevance to any test -- including a critical mass test -- that the Commission is considering.

EXHIBIT A

Country	Iridium Operations
Brazil	<p>Inepar Electrelectronica, an investor in Iridium through the Iridium SudAmerica Corporation, is involved in joint ventures with two Brazilian states to build and operate local telephone networks. Iridium has stated in its publicity materials that it expects to have service licenses in place in Brazil by mid-1996.</p>
China	<p>BCE Inc., a founder member of Iridium Canada, Inc., an Iridium shareholder, through its ownership of BCE Mobile Communications, Inc. and BCE Telecom International, also has an 80% shareholding through its subsidiary Bell Canada, in Yantai Bell, a joint venture with China Unicom to provide mobile telephone services.</p> <p>Iridium China, owned by China Aerospace, plans to build an Iridium gateway near Beijing.</p> <p>China Great Wall Industry Corporation (CGWIC) is an investor and an industrial partner in Iridium and will supply Long March IIc launches to the Iridium program.</p>
Mexico	<p>Sprint, an Iridium investor, has a 31% shareholding in a joint venture licensed to provide long distance fixed telephone services in Mexico from 1997.</p>
Korea	<p>Korea Mobile Telecom (KMT), an Iridium investor, provides cellular and paging services in Korea. Management control of KMT is held by Sung Kyong Business Group, the fifth largest conglomerate in Korea.</p>
Russian Federation	<p>Sprint, an Iridium investor, has a shareholding in Sprint Set, a national alternative telecommunications network in the Russian Federation.</p> <p>Khrunichev State Research and Production Space Center is also an investor in Iridium and will provide Proton launch services to the venture.</p>
Australia	<p>Sprint International, an affiliate of Sprint, provides data and voice telecommunications services.</p> <p>Cable and Wireless, an Iridium investor through Vebacom, is also a major shareholder/investor in Optus, one of the two providers of basic fixed telecoms services, which is also one of the three cellular operators.</p>
Argentina	<p>STET, an Iridium investor, is the provider of fixed telecommunications services in a large part of the country (including much of Buenos Aires) as a result of its joint ownership (with, inter alia, France Telecom) of Telecom Argentina.</p>

EXHIBIT A

Country	Name of Iridium Investor
India	<p>Iridium India Telecom Private Ltd., an investor in Iridium, is 100% owned by VSNL, the international service provider in India. Iridium has an agreement with VSNL to operate an Iridium gateway into India.</p> <p>BCE Inc., a founder member of Iridium Canada, Inc., an Iridium shareholder, through its ownership of BCE Mobile Communications and BCE Telecom International, has a 39% shareholding, through its subsidiary Bell Canada, in Tata Communications, a consortium offering fixed and mobile services in Andhra Pradesh.</p>
Indonesia	<p>Pacific Electric Wire & Cable Co., Ltd. (PEWC), an Iridium investor, has a joint venture with PT Satelindo to provide the Iridium service in Indonesia. PT Satelindo is a major provider of cellular and international telecommunications services in Indonesia. An Iridium gateway will be built in Jakarta.</p>
Thailand	<p>United Communications Industry Company, Ltd., founder of Thai Satellite Telecommunications Co., Ltd., an Iridium investor, is one of the largest cellular and paging operators in Thailand. The Communications Authority of Thailand, the provider of fixed telephone services in Thailand, is also an Iridium investor.</p>
Saudi Arabia	<p>Iridium Middle East Corporation, an Iridium investor, was formed by Saudi Arabia Binladin Group (among the largest industrial groups in Saudi Arabia) and Mawarid Overseas Corporation (one of the largest diversified companies in Saudi Arabia). Both have telecommunications operations. Mawarid also controls Iridium Africa Corporation.</p>
Hong Kong	<p>Cable and Wireless, an Iridium investor through Vebacom, owns the controlling interest in Hong Kong Telecom, a provider of fixed and mobile telecommunications services and the operator of international switched services to and from Hong Kong.</p>
Poland	<p>Sprint, an Iridium investor, is involved in a joint venture with local companies to build and operate an integrated telephone and cable television network.</p>
Portugal	<p>Sprint, an Iridium investor, has a joint venture with Companhia Portuguesa Radio Marconi to provide voice and data communications.</p>
Greece	<p>An affiliate of STET, STET Hellas, is one of the two cellular operators in Greece. STET is an investor in Iridium.</p>
Malaysia	<p>Telecom Malaysia, an Iridium investor through its 40% share of Iridium Malaysia, provides fixed and cellular telecommunications in Malaysia.</p>

**SPHERES OF INFLUENCE¹ OF GLOBALSTAR PARTNERS
AND SERVICE PROVIDERS IN LARGE MARKETS²**

Country	Names of Spheres of Influence
United States	Globalstar has a license to operate in the United States.
Germany	Airtouch, a strategic partner of Globalstar, has a 35% share in Mannesmann Mobilfunk, one of the three cellular operators in Germany. DASA, part of Daimler Benz, is a Globalstar strategic partner and major satellite subcontractor.
France	France Telecom, a strategic partner of Globalstar, is the PSTN operator and one of two cellular operators in France.
Italy	Alenia Spazio, Italy's largest aerospace company, is a Globalstar strategic partner and major satellite subcontractor. Elsag Bailey, Globalstar exclusive service provider for Italy and nine other countries, is a provider of a variety of communications services, including value added network services. Airtouch, a strategic partner of Globalstar, has a 11.7% shareholding in Omnitel Pronto Italia, one of the two GSM cellular operators in Italy.
UK	Vodafone, a strategic partner Globalstar, is a one of the two UK cellular operators, and one of a total of four mobile telephony (cellular or PCS) operators.
Brazil	Globalstar do Brasil, a service provider of Globalstar, is a partnership of Space Systems/Loral, Daimler-Benz Aerospace and Brasilstar. Telebras, the monopoly PTO, will provide the gateway.

¹ "Sphere of influence" includes countries in which Globalstar has (1) investors who are currently basic or mobile telecommunications service operators in that country; (2) service providers who are currently basic or mobile telecommunications service operators in that country; or (3) investors or service providers that have equity interests of more than 20% in basic or mobile telecommunications service operators in that country. "Investor" includes any entity that (1) holds a direct equity interest in Globalstar; (2) wholly owns a subsidiary that holds a direct equity interest in Globalstar; or (3) holds a direct equity interest in an entity whose sole purpose is to hold and manage a direct equity interest in Globalstar. (Basic or mobile telecommunications service operators do not include organizations such as Comsat in the U.S. or Morsviazspudnik in Russia, whose main business is participation in international satellite consortia). The information provided herein has been compiled entirely from publicly available sources. ICO does not guarantee the accuracy or completeness of the information.

² "Large markets" are countries with a GDP in excess of \$60Bn in 1993. Countries are listed in descending order, according to their GDP. ICO in no way intends to suggest that the countries listed are of any relevance to any test -- including a critical mass test -- that the Commission is considering.

EXHIBIT A

Country	Nature of global influence
Mexico	<p>Globalstar de Mexico, a service provider of Globalstar, is a joint venture between Globalstar partners AirTouch, Loral and Telefonica Autrey. Telefonica Autrey is the holding company of Optel Telecomunicaciones, S.A., a data communications company in Mexico.</p> <p>France Telecom, a Globalstar strategic partner, has a 5% shareholding in Telmex, the national telecommunications operator, and played a major role in the company's privatization.</p>
Korea	<p>Dacom, a strategic partner of Globalstar, is the major supplier of fixed data transmission services in Korea, and one of two suppliers of international voice services.</p> <p>Hyundai, South Korea's largest conglomerate, is a Globalstar strategic partner.</p>
Russian Federation	<p>Globalstar has received approval from the Russian Ministry of Telecommunications to sell its service in Russia. Globalstar and Rostelcom (a major supplier of fixed telecommunications services in the Russian Federation and the owner of telephone companies which are the sole provider of fixed services in many areas) have formed a joint venture that will be the exclusive service provider of Globalstar service in Russia.</p>
Netherlands	<p>Vodafone, a strategic partner of Globalstar, has a 35% shareholding in Libertel, one of the two cellular operators.</p>
Australia	<p>Vodafone, a strategic partner of Globalstar, has a 95% shareholding in Vodafone Australia, one of the three cellular operators in Australia.</p>
Argentina	<p>France Telecom, a strategic partner of Globalstar, has a 33% shareholding in Telecom Argentina, the provider of fixed telecommunications services for a large part of Argentina.</p>
India	<p>Airtouch, a strategic partner of Globalstar, has a 20% shareholding in RPG Cellular, a cellular operator in Madras. Vodafone, another service provider of Globalstar, also owns a share of RPG Cellular.</p> <p>France Telecom, a strategic partner of Globalstar, has a 35% shareholding in BPL Bombay, one of the two cellular operators in the Bombay region and the only GSM operator in that region.</p>
Belgium	<p>Airtouch, a strategic partner of Globalstar, has a 25% shareholding in Belgacom Mobile, one of two cellular operators in Belgium.</p>

EXHIBIT A

Country	Nature of rights of influence
Sweden	<p>France Telecom (Sweden), a subsidiary of France Telecom, a strategic partner of Globalstar, is a competitive telecommunications operator in Sweden.</p> <p>Airtouch and Vodafone, both service providers of Globalstar, between them have a 64% shareholding in Nordictel, a cellular operator.</p>
Indonesia	<p>France Telecom, a strategic partner of Globalstar, has a substantial shareholding in Pramindo Ikat, a consortium with a license to build and operate a regional telephone network.</p>
South Africa	<p>Vodafone, a strategic partner of Globalstar, has a 35% shareholding in Vodacom, one of the two cellular operators in South Africa.</p>
Hong Kong	<p>Vodafone, a strategic partner of Globalstar, owns a 35% shareholding in Pacific Link, a cellular operator.</p>
Poland	<p>France Telecom, a strategic partner of Globalstar, has a 25% shareholding in PTK Centertel, a cellular operator.</p>
Portugal	<p>Airtouch, a strategic partner of Globalstar, has a 23% shareholding in Telecel, one of the two cellular operators in Portugal.</p>
Greece	<p>Between them, Vodafone and France Telecom, both strategic partners of Globalstar, own 80% of Panafon, one of the two cellular operators in Greece</p>
Israel	<p>Bezeq, a service provider of Globalstar, is the provider of fixed public telecommunications services and cellular services.</p>

**SPHERES OF INFLUENCE¹ OF ODYSSEY
INVESTORS IN LARGE MARKETS²**

Country	Nature of sphere of influence
USA	Odyssey has a license to operate in the U.S.
UK	Teleglobe International (UK) Ltd., a subsidiary of Teleglobe Inc., an investor in Odyssey, has an international simple resale (ISR) licence in UK, and provides international telecommunications service in the UK.
Canada	Teleglobe Inc., an investor in Odyssey, is the sole provider of international telephone services in Canada (except for US-Canada traffic).

¹ "Sphere of influence" includes countries in which Odyssey has (1) investors who are currently basic or mobile telecommunications service operators in that country; (2) service providers who are currently basic or mobile telecommunications service operators in that country; or (3) investors or service providers that have equity interests of more than 20% in basic or mobile telecommunications service operators in that country. "Investor" includes any entity that (1) holds a direct equity interest in Odyssey; (2) wholly owns a subsidiary that holds a direct equity interest in Odyssey; or (3) holds a direct equity interest in an entity whose sole purpose is to hold and manage a direct equity interest in Odyssey. (Basic or mobile telecommunications service operators do not include organizations such as Comsat in the U.S. or Morsviazputnik in Russia, whose main business is participation in international satellite consortia). The information provided herein has been compiled entirely from publicly available sources. ICO does not guarantee the accuracy or completeness of the information.

² "Large markets" are countries with a GDP in excess of \$60Bn in 1993. Countries are listed in descending order, according to their GDP. ICO in no way intends to suggest that the countries listed are of any relevance to any test -- including a critical mass test -- that the Commission is considering.

EXHIBIT B

Wireless Competitive Environment Americas ¹				
Country	Cellular		Paging	
	Competitive	Restricted	Competitive	Restricted
Argentina	√		√	
Brazil	Pending ²		√	
Canada	√		√	
Chile	√		√	
Colombia	√		√	
Cuba		√		√
Ecuador	√		√	
Mexico	√		√	
Peru	√		√	
Venezuela	√		√	
Regional Summary	8	1	9	1

Competitive = Full competition; Restricted = monopoly/duopoly service provision
 *denotes information is not available
 Sources: ITU, National Trade Data Bank/Department of Commerce, Industry Trade Press
 Note: The information provided in this table is based on determinations from the ITU Americas Telecommunication Indicators, 1994. Up were made for those countries where significant legislative or policy changes have occurred in the last two years. The responses refer to the legal possibility of competition not necessarily the status of the market.

¹For the purposes of examining the global competitive environment, fifty countries were chosen for analysis. These countries were identified as those with the largest GDP in 1993 for each of the four major regions of the world. Based on the size and character of the region, the top ten largest GDP, excluding the United States, were chosen to represent the Americas. Countries are listed in alphabetical order.

²Currently, there is fast-track legislation moving through Congress that will allow private companies to obtain cellular licenses and the Ministry is committed to introducing competition as soon as possible.

Wireless Competitive Environment Asia/Pacific ³				
Country	Cellular		Paging	
	Competitive	Restricted	Competitive	Restricted
Australia	√		√	
China		√		√
Hong Kong	√		√	
India	√		√	
Indonesia	√		*	*
Japan	√		√	
Korea	√		√	
Malaysia	√		√	
Myanmar		√	*	*
New Zealand	√		√	
Pakistan	√		*	*
Philippines	√		√	
Singapore	√		√	
Taiwan	√		√	
Thailand	√		*	*
Regional Summary	13	2	10	1

Competitive = Full competition; Restricted = monopoly/duopoly service provision
*denotes information is not available
Sources: ITU, National Trade Data Bank/Department of Commerce, Industry Trade Press
Note: The information provided in this table is based on determinations from the ITU Asia Pacific Telecommunication Indicators, 1995. Updates were made for those countries where significant legislative or policy changes have occurred in the last year. The responses refer to the legal possibility of competition, not necessarily the status of the market.

³For the purposes of examining the global competitive environment, fifty countries were chosen for analysis. These countries were identified as those with the largest GDP in 1993 for each of the four major regions of the world. Based on the size and character of the region, the top fifteen countries with the largest GDP were chosen to represent Asia/Pacific. Countries are listed in alphabetical order.

Wireless Competitive Environment Europe ⁴				
Country	Cellular		Paging	
	Competitive	Restricted	Competitive	Restricted
E. Europe				
Belarus	√		√	
Hungary	√		√	
Kazakhstan		√		√
Poland	√		√	
Russian Federation	√		√	
Ukraine	√		√	
W. Europe				
France	√		√	
Germany	√		√	
Italy	√		√	
Netherlands	√		√	
Spain	√		√	
Sweden	√		√	
Switzerland		√	√	
UK	√		√	
Regional Summary	12	2	13	1

Competitive = Full competition; Restricted = monopoly/duopoly service provision
 *denotes information is not available
 Sources: ITU, National Trade Data Bank/Department of Commerce, Industry Trade Press
 Note: The information provided in this table is based on determinations from the ITU Telecommunication Indicators for Western & Southern Europe, 1994 and Telecommunication Indicators for Economies in Transition, 1994. Updates were made for those countries where significant legislative or policy changes have occurred in the last two years. The responses refer to the legal possibility of competition, not necessarily the status of the market.

⁴For the purposes of examining the global competitive environment, fifty countries were chosen for analysis. These countries were identified as those with the largest GDP in 1993 for each of the four major regions of the world. Based on the size and character of the region, six countries were chosen to represent Eastern Europe and eight from Western Europe, based on having the largest GDP in each sub-region. Countries are listed in alphabetical order.

Wireless Competitive Environment Middle East/Africa ⁵				
Country	Cellular		Paging	
	Competitive	Restricted	Competitive	Restricted
Middle East				
Iran	√		*	*
Israel	√		√	
Kuwait		√	*	*
Saudi Arabia		√		√
Africa				
Egypt		√		√
Libya		√	*	*
Morocco	√		*	*
Nigeria	√		√	
South Africa	√			√
Tunisia		√	*	*
Regional Summary	5	5	2	3

Competitive = Full competition; Restricted = monopoly/duopoly service provision
 *denotes information is not available
 Sources: ITU, National Trade Data Bank/Department of Commerce, Industry Trade Press
 Note: The information provided in this table is based on determinations from the ITU African Telecommunication Indicators, 1995. Updates were made for those countries where significant legislative or policy changes have occurred in the last year. The responses refer to the legal possibility of competition not necessarily the status of the market.

⁵For the purposes of examining the global competitive environment, fifty countries were chosen for analysis. These countries were identified as those with the largest GDP in 1993 for each of the four major regions of the world. Based on the size and character of the region, four countries were chosen to represent the Middle East and six represent Africa, based on having the largest GDP in each sub-region. Countries are listed in alphabetical order.

CERTIFICATE OF SERVICE

I, Kimberly E. Thomas, do hereby certify that the foregoing **COMMENTS OF ICO GLOBAL COMMUNICATIONS** was hand delivered on this 15th day of July, to the following:

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., - Room 222
Washington, D.C. 20554

Michele C. Farquhar, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., - Room 5002
Washington, D.C. 20554

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W., - Room 814
Washington, D.C. 20554

William E. Kennard
Office of General Counsel
Federal Communications Commission
1919 M Street, N.W., - Room 614B
Washington, D.C. 20554

Commissioner James H. Quello
Federal Communications Commission
1919 M Street, N.W., - Room 802
Washington, D.C. 20554

Diane Cornell, Chief
Telecommunications Division
International Bureau
Federal Communications Commission
2000 M Street, N.W., - Room 838
Washington, D.C. 20554

Commissioner Rachelle B. Chong
Federal Communications Commission
1919 M Street, N.W., - Room 844
Washington, D.C. 20554

Cecily C. Holiday, Deputy Chief
Satellite & Radiocommunications Division
International Bureau
Federal Communications Commission
2000 M Street, N.W., - Room 590
Washington, D.C. 20554

Commission Susan Ness
Federal Communications Commission
1919 m Street, N.W., - Room 832
Washington, D.C. 20554

Paula Ford
International Bureau
Federal Communications Commission
2000 M Street, N.W., - Room 590
Washington, D.C. 20554

Don Gips, Chief
International Bureau
Federal Communications Commission
2000 M Street, N.W., - Room 830
Washington, D.C. 20554

Virginia Marshall
International Bureau
Federal Communications Commission
2000 M Street, N.W., - Room 590
Washington, D.C. 20554

Thomas Tycz, Chief
Satellite & Radiocommunications Division
International Bureau
Federal Communications Commission
2000M Street, N.W., - Room 800
Washington, D.C. 20554

Richard Beard
Senior Deputy US Coordinator
US Department of State
EB/CIP - Room 4826
2201 C Street, N.W.
Washington, D.C. 20520

James L. Ball
Assistant Bureau Chief
Office of Plans and Policy
Federal Communications Commission
1919 M Street, N.W., - Room 820
Washington, D.C. 20554

Mike Fitch
Deputy US Coordinator
US Department of State
EB/CIP - Room 4826
2201 C Street, N.W.
Washington, D.C. 20520

Robert M. Pepper, Chief
Office of Plans and Policy
Federal Communications Commission
1919 M Street, N.W., - Room 822
Washington, D.C. 20554

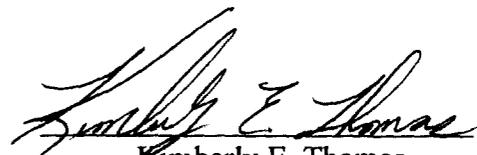
Vonya B. McCann
US Department of State
EB/CIP - Room 4826
2201 C Street, N.W.
Washington, D.C. 20520

Richard DalBello
Assistant Director for Space
Office of Science and Technology Services
Old Executive Office Building
Washington, D.C. 20500

Larry Irving, Assistant Secretary
NTIA
14th & Constitution Ave., N.W.
Room 4898
Washington, D.C. 20230

Jack Gleason
Director, International Policy Division
NTIA
14th & Constitution Ave., N.W.
Room 4720
Washington, D.C. 20230

Richard Parlow
Office of Spectrum Management
NTIA
14th & Constitution Ave., N.W.
Room 4099
Washington, D.C. 20230



Kimberly E. Thomas