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OFFICE OF THE SECRETARY

November 19, 1998

VIA COURIER

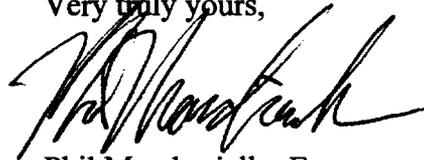
Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Ms. Salas:

On behalf of Mobile Communications Holdings, Inc., we are writing to correct a clerical error in the MOBILE COMMUNICATIONS HOLDINGS, INC. COMMENTS ON RESPONSE OF IRIDIUM LLC TO SURREPLY OF ICO SERVICES LIMITED ("Comments"), filed on November 18, 1998. Please associate the enclosed certificate of service and signature page with the Comments. The certificate of service filed with the original Comments bore the incorrect date, and the signature page was not signed.

We apologize for any inconvenience caused as a result of this inadvertent clerical error. Questions or correspondence concerning this matter should be directed to the undersigned.

Very truly yours,



Phil Marchesiello, Esq.

Enclosure

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BEFORE THE
Federal Communications Commission

WASHINGTON, DC

In the Matter of:)
)
ICO SERVICES LIMITED) RM No. 9328
)
Petition for Expedited Rulemaking to)
Establish Eligibility Requirements for)
the 2 GHz Mobile Satellite Service)

TO: Chief, International Bureau

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MOBILE COMMUNICATIONS HOLDINGS, INC. COMMENTS
ON RESPONSE OF IRIDIUM LLC
TO SURREPLY OF ICO SERVICES LIMITED

Mobile Communications Holdings, Inc. ("MCHI"),¹ by its attorneys, hereby submits these Comments on the Response of Iridium LLC² to the Surreply of ICO

¹ MCHI filed an application in the 2 GHz processing round seeking Federal Communications Commission authorization to launch and operate a second generation satellite system consisting of 26 non-geostationary ("NGSO") satellites in elliptical and circular low earth orbits (the "ELLIPSO 2G" system) in the 2 GHz band for the provision of voice and data communications services. See FCC File No. 180-SAT-P/LA-97(26). In addition, MCHI holds an authorization to construct, launch, and operate a global "Big LEO" satellite system comprised of 16 NGSO satellites in elliptical and equatorial low earth orbits (the "ELLIPSO" system) for the provision of voice, data, paging/messaging, and other narrowband communications services on a global basis. FCC File Nos. 11-DSS-P-91(6); 18-DSS-P-91(18); 11 SAT-LA-95; 12 SAT-AMEND-95; 158-SAT-AMEND-96.

² Response to Surreply, filed by Iridium LLC (Oct. 28, 1998) ("Response").

Services Limited.³ MCHI concurs with Iridium's position that the adoption of ICO's proposal for a separate, initial processing round for new entrants⁴ is contrary to the public interest and was proposed "so that ICO Services [can] attempt to clear the field of . . . competitors and not so that the Commission [can] enhance competition."⁵ It is not appropriate for the Federal Communications Commission at this time to consider providing ICO with special or preferential treatment⁶ in the 2 GHz proceeding.⁷ Rather, the Commission should review all applications to provide Mobile-Satellite Service in the 2 GHz Spectrum⁸ to determine whether the applications are mutually exclusive and how the 2 GHz Spectrum can be utilized most efficiently to accommodate the greatest number

³ Motion to File Leave to File Surreply Comments and Surreply Comments of ICO Services Limited (Oct. 13, 1998) ("ICO Surreply").

⁴ See ICO Surreply, at 2.

⁵ Response, at 6

⁶ See Opposition of Mobile Communications Holdings, Inc. to Petition For Expedited Rulemaking of ICO Services Limited (Aug. 27, 1998), at 8 & n.17 ("In affect, ICO suggests that the Commission provide ICO with immediate, exclusive, and unfettered access to the entire 2 GHz Spectrum while the Commission proceeds to review other applications.").

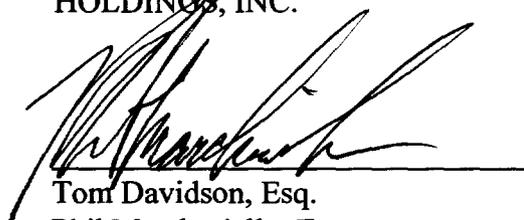
⁷ Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for Use by the Mobile-Satellite Service, First Report and Order and Further Notice of Proposed Rulemaking, 12 FCC Rcd 7388 (1997); see also Satellite Applications and Letters of Intent Accepted for Filing in the 2 GHz Band, Public Notice, Report No. SPB-119 (rel. March 19, 1998); Clarifications and Corrections to Public Notices Report Nos. SPB-88 and SPB-89 Establishing Deadlines for Applications, Letters of Intent, and Amendments to Applications in the 2 GHz and 36-51.4 GHz Frequency Bands, Public Notice, 12 FCC Rcd 12050 (Aug. 13, 1997); Cut-off Established for Additional Space Station Applications, Letters of Intent, and Amendments to Pending Applications in the 2 GHz Frequency Band, Public Notice, 12 FCC Rcd 10446 (July 22, 1997).

⁸ The Commission has allocated 70 MHz of spectrum in the 2 GHz band—1990-2025 MHz and 2165-2200 MHz—for the provision of MSS by global satellite systems.

of applicants.⁹ Until this process has been completed, further discussion of the appropriate definition of the term "affiliate" is premature, unwarranted, and a waste of scarce Commission resources.¹⁰

Respectfully Submitted,

MOBILE COMMUNICATIONS
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/s/ Jill Abeshouse Stern
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Date: November 19, 1998

⁹ MCHI has recommended that the Commission initiate a negotiated rulemaking to facilitate formal discussions between the applicants and, thereby, to realize the efficiencies that can be gained through spectrum sharing among applicants. Consolidated Reply Comments of Mobile Communications Holdings, Inc. (June 3, 1998), at 8-11.

¹⁰ See Response, at 6 ("ICO Services is disrupting the Commission's work in the 2 GHz proceeding and wasting time and resources of the Commission and other parties while at the same time it complains to the rest of the world that the FCC is slow rolling its application.").

Certificate of Service

I, Sonya N. Hebert, do hereby certify that the foregoing **COMMENTS ON RESPONSE TO ICO'S SURREPLY** was delivered, via hand delivery, on this 19th day of November, 1998, to the following:

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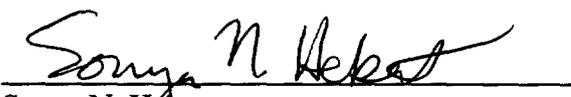
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