



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

Virginia Office
7925 JONES BRANCH DRIVE
SUITE 6200
MCLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wrf.com

January 20, 2004

Tricia Paoletta
202.719.7532
tpaoletta@wrf.com

Marlene H. Dortch
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20006

Re: Written *Ex Parte* Presentation in IB Docket No. 02-54

Dear Ms. Dortch:

Iridium Satellite LLC (“Iridium”), by its attorneys, provides this written *ex parte* report to supplement the Commission’s understanding of the costs of Iridium’s current de-orbiting requirement. Iridium provides this confidential information in support of its request that the Commission maintain a flexible, case-by-case approach on mitigation requirements, rather than mandate Iridium’s current de-orbit requirement through its upcoming order or any rule change, or otherwise “codify” Iridium’s existing mitigation plans. Specifically, in Attachment 1 Iridium provides specific confidential information regarding the preservation of satellite fuel for de-orbiting that would otherwise be available to prolong substantially the life of its satellite system and service to customers. In Attachment 2, Iridium provides additional confidential information on the costs to the company associated with its de-orbit requirement.

As noted above, Attachments 1 and 2 contain sensitive commercial, financial and technical information for which Iridium is requesting confidential treatment under separate cover.

Pursuant to Section 1.1206(b)(2) of the Commission’s rules, a copy of this letter has been filed electronically through the Commission’s electronic comment filing system (ECFS).

Sincerely,

Tricia Paoletta

cc (by email): Sheryl Wilkerson, Roderick Porter, Thomas Tycz, John Martin, Robert Nelson, Karl Kensinger, Sankar Persaud, Stephen Duall

Attachment 1

Iridium's real-world experience shows that de-orbiting requires preservation of satellite fuel that would otherwise be available to prolong substantially the life of its satellite system and service to customers.

Attachment 2

Iridium's real-world experience shows that de-orbiting is exceedingly expensive.