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November 29, 2004

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Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **Ex Parte Notice**

Amendment of Part 22 of the Commission's Rules to Benefit the
Consumers of Air-Ground Telecommunications Services
WT Docket No. 03-103

Dear Ms. Dortch:

Space Data Corporation ("Space Data"), through counsel, submits this ex parte notice to respond to inaccurate and unsubstantiated assertions that AirCell, Inc. ("AirCell") recently made in a number of ex parte presentations regarding Space Data's air-to-ground ("ATG") proposals in the above-referenced proceeding. Specifically, AirCell filed four ex parte notices between October 14 and October 22, 2004, each of which included a PowerPoint presentation with an identical slide entitled "Space Data Shortcomings."¹ Attached is a response that refutes each of AirCell's assertions. AirCell's comments show a complete lack of understanding about Space Data's proposals and the benefits and efficiencies of Space Data's stratospheric network. Accordingly, the Commission should give AirCell's comments no weight.

¹ See ex parte letters from Michele C. Farquhar, counsel to AirCell, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, dated October 14, 20, and 22, 2004.

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Pursuant to Section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed with the office of the Secretary. If you have any questions regarding this notification, please contact the undersigned.

Very truly yours,

/s/ Cheryl A. Tritt

Cheryl A. Tritt
Counsel to Space Data Corporation

Attachment

cc: Peter Tenhula
David Furth
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