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Federal Communications Commission
Office of Secretary

Via Hand Delivery

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

Re: Mobile Satellite Ventures Subsidiary LLC
Ex Parte Presentation
IB Docket No. 01-185
File No. SAT-MOD-20031118-00333 (ATC application)
File No. SAT-AMD-20031118-00332 (ATC application)
File No. SES-MOD-20031118-01879 (ATC application)

Dear Ms. Dortch:

Geologic Solutions Inc. hereby urges the Commission to afford L-band Mobile Satellite Service ("MSS") operators greater flexibility in their provision of an Ancillary Terrestrial Component ("ATC"), as requested by Mobile Satellite Ventures LP ("MSV") in the above-captioned proceedings. The increased flexibility requested by MSV will ensure that next-generation MSS systems in the L-band can finally achieve the ubiquitous coverage, capacity, and economies of scale needed for a true consumer service. In contrast, the restrictions on L-band ATC advocated by Inmarsat Ventures plc ("Inmarsat") will only ensure that MSS forever remains a niche service catering to price-insensitive users operating in remote areas. Geologic Solutions Inc provides wireless services the to Truck Load Commercial Carrier business within the U. S. and Canada. These carriers have routes of and exceptionally irregular nature which requires the ubiquitous coverage offered by this service. These services need to be provided for a business segment that unfortunately has a very high operating ratio and the price/performance service that MSV can provide is critical to these business. Geologic Solutions has been providing these services since 1995.

While Geologic Solutions Inc. has developed a viable business using current-generation MSS satellites to serve niche markets, we are excited about the future potential for MSS when supplemented with ATC. Because the market for this type of service is small, the economies of scale needed to drive down equipment and service prices have not developed. With ATC, however, MSS has the potential to evolve into a true consumer service. ATC will provide the coverage, capacity, and economies of scale needed to bring MSS equipment and service prices to affordable levels. Which can be adapted to the commercial services we currently provide as described in the previous paragraph. Moreover, by overcoming satellite signal blockage in urban

GeoLogic Solutions, Inc.
13625-B Dulles Technology Drive
Herndon, Virginia 20171
T877.847.3303
www.gogeologic.com

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areas, ATC will allow MSS to become a truly ubiquitous service, allowing service providers to market their products to customers not only in rural and remote areas but to customers in the most densely populated urban cores as well.

Geologic Solutions Inc. understands that Inmarsat is opposing MSV's efforts to make MSS into a more attractive service. This comes as no surprise to Geologic Solutions Inc.. If MSV does not succeed in its development of a next-generation MSS system, Inmarsat will have a monopoly in the L-band MSS market in the United States. With no competitive pressure to discipline Inmarsat's rates, terms, and conditions, L-band MSS service providers will struggle to survive, resulting in bankruptcies, job losses, and a step backward in the slowly rebounding telecommunications sector. Moreover, with only Inmarsat left standing, the prospects for innovation in L-band MSS technology will cease to exist. L-band MSS will remain stuck in time as a service useful for only a handful of users in remote areas.

Geologic Solutions Inc. understands that Inmarsat has used concerns of potential interference to oppose and delay MSV's development of a next-generation MSS system. These concerns are overstated and may not be based on total facts. For example, our customers will continue to use their satellite terminals after MSV deploys ATC, but we are not concerned that these terminals will experience interference from MSV's ATC base stations. This is because our customers do not use their satellite terminals in areas where MSV is expected to deploy base stations to overcome satellite signal blockage. By definition, if MSV needs to deploy an ATC base station to overcome signal blockage, our satellite terminals will not work effectively in those areas.

The Commission is at a crossroads in the development of MSS technology. Geologic Solutions Inc. urges the Commission to follow the path of innovation and better consumer service by adopting MSV's proposals for increased flexibility for ATC in the L-band.

Very truly yours,

A handwritten signature in black ink, appearing to read "T.G. Cuthbertson".

T.G. Cuthbertson
V. P. Government Industry Liaison &
Network Technology
Geologic Solutions Inc.