

June 27, 2005

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

Re: *Letter from Globalstar LLP filed June 20, 2005 in IB Docket Nos. 99-81, 02-34 & 00-248; ET Docket No. 00-258*

Dear Ms. Dortch:

TMI Communications and Company Limited Partnership and its affiliate, TerreStar Networks Inc. (“TMI/TerreStar”)¹ appreciate the views of Globalstar LLP (“Globalstar”) on the need for sufficient spectrum for 2 GHz mobile satellite service (“MSS”). Globalstar correctly points out that just two years ago the Commission reallocated nearly *half* of the 2 GHz MSS spectrum for the benefit of the terrestrial wireless industry. We agree wholeheartedly with Globalstar that any further reallocation of 2 GHz MSS spectrum would deprive the public of a robust service that will benefit rural and urban consumers, as well as the public safety community nationwide.²

We do not believe, however, that it is necessary for this much-needed redistribution of surrendered spectrum to the remaining licensees in the 2 GHz MSS band to await resolution of Globalstar’s pending petition for reconsideration. The Commission routinely denies requests to delay proceedings involving authorizations and spectrum on the basis of pending litigation, preferring instead to move forward and deal with any consequences of litigation that may later arise.³ Any prejudice to Globalstar is uncertain today; if Globalstar succeeds in its litigation, any resulting prejudice can be remedied at that juncture. But it is certain today that delay in this proceeding would greatly prejudice the interests of those who hold current MSS authorizations and need to know how much spectrum will be available to them as they further construct satellites, plan their systems, and prepare to serve the public.

¹ TerreStar is the prospective assignee of TMI’s 2 GHz MSS authorization and has contracted with Space Systems/Loral Inc. for a satellite that will operate in this band.

² *See, e.g.*, Comments of TerreStar Networks Inc., WT Docket No. 05-157 (filed April 28, 2005) (explaining homeland security and other public safety benefits of a robust MSS/ATC service).

³ *See, e.g.*, *General Motors Corp. and Hughes Electronics Corp.*, 19 FCC Rcd. 473 (2004); *Application of Wirelessco*, 10 FCC Rcd. 13233 (1995); *Black Crow Wireless LP*, 16 FCC Rcd. 15643 (2001).

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Respectfully submitted,

/s/ Gregory C. Staple

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