Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

ORIGINAL
RECEIVED
MAR - 1 2006
Federal Communications Commission
Office of Secretary

In the matter of	)	
	)	
Use of Returned Spectrum in the 2 GHz MSS Frequency Bands	)	IB Docket Nos. 05-220 and 05-221
	)	
	)	
Inmarsat Global Limited Petition for Declaratory Ruling	)	File Nos. SAT-PPL-20050926-00184
	)	SAT-PDR-20050926-00184
	)	SAT-AMD-20051116-00221

CONSOLIDATED REPLY

Inmarsat replies to the pleadings filed in response to the Petitions for Reconsideration of the two Orders in which the Commission: (1) assigned the entire 2 GHz band to TMI and ICO (the "*2 GHz Order*"); and (2) dismissed Inmarsat's Petition for Declaratory Ruling ("PDR") to provide MSS at 2 GHz.

In its Petition for Reconsideration, Inmarsat demonstrated that the decision to assign the entire 2 GHz band to TMI and ICO was based on the following flawed and unsubstantiated assumptions: (i) other MSS operators do not need access to 2 GHz because they can use other bands to provide the services possible at 2 GHz; (ii) TMI should have access to more 2 GHz spectrum because it does not have other MSS interests; and (iii) awarding the entire 2 GHz band to TMI and ICO will produce public safety and rural broadband benefits different from those that competing applicants would be able to provide. Moreover, Inmarsat showed that the Commission failed to address alternative solutions that would serve the public interest better than licensing to duopoly at 2 GHz today.

Globalstar's Petition for Reconsideration reiterated many of these same themes, emphasizing that the public interest determinations in the *2 GHz Order* were "both premature and unsubstantiated."[1] CTIA and T-Mobile support Inmarsat's and Globalstar's calls for

[1] Globalstar Petition for Reconsideration at 8.

No. of Copies rec'd 0+4
List ABCDE

reconsideration. As T-Mobile states: "the *2 GHz MSS Order* cannot withstand APA scrutiny, as it relies upon unrealistic assumptions, fails to fully consider rational suggestions, and arrives at an unsupported conclusion that is contrary to any reasonable interpretation of the record evidence."[2]

Only two parties oppose reconsideration: TMI and ICO, the recipients of the 2 GHz spectrum windfall. Significantly, TMI and ICO fail to refute the identified deficiencies of the *2 GHz Order*. Instead, TMI and ICO rely on arguments that the Commission expressly declined to consider, and on factors that would apply equally to all potential 2 GHz MSS operators. Moreover, TMI and ICO fail to address how it better serves the public interest to assign the entire 2 GHz band *to them,* rather than to authorize additional MSS providers, and thereby provide for increased competition in the band.

For the reasons provided in Inmarsat's Petition for Reconsideration, and those set forth below, the Commission should reconsider its decisions and reinstate Inmarsat's PDR to provide MSS to the United States at 2 GHz.

I. TMI'S AND ICO'S JUSTIFICATIONS DO NOT CURE THE DEFICIENCIES IN THE *2 GHZ ORDER*

Inmarsat's and Globalstar's Petitions show that the 2 GHz spectrum award to TMI and ICO was unsubstantiated. Namely, there is no rational basis on which to conclude that greater public safety and rural broadband services would accrue by increasing ICO's and TMI's spectrum assignments by 250 percent, rather than by allowing a third (or possibly a fourth) competitor in the band.[3] This is particularly true when two qualified MSS operators—Inmarsat

---

[2] Comments of T-Mobile at 4 (footnotes omitted).

[3] The relevant issue on reconsideration is whether there is a substantiated and reasoned basis for deciding to award TMI and ICO more spectrum instead of licensing additional operators in the band. *Cf.* ICO Opposition at 8; TMI Opposition at ii, 17.

and Globalstar—were on record with proposals to meet those very same public safety and rural broadband needs by the end of the decade.[4]

Instead of addressing these legal shortcomings, TMI and ICO argue that a number of different considerations could support the Commission's decision: (1) their plans for an ATC network; (2) the technical capabilities of TMI's proposed spacecraft; and (3) the speed at which TMI and ICO could deploy their hybrid MSS/ATC networks.[5] As Inmarsat demonstrated in its Petition for Reconsideration, in reaching its decision, the Commission expressly rejected each of these factors as not relevant. Moreover, these considerations would not support the decision to award the entire 2 GHz band to TMI and ICO in any event.

ATC: Commission policy is clear that ATC is not a legitimate justification for seeking additional spectrum.[6] Moreover, the Commission emphasized in the *2 GHz Order* that it did not "reach[] the issue of whether ICO and TMI/TerreStar need additional spectrum to provide ATC, as they claim."[7] For this reason, the virtually identical letters from state and local public safety officials that TMI and ICO tout in their Oppositions[8] are not "compelling," or even remotely probative: those letters support the award of spectrum so that TMI and ICO *can provide ATC*.[9] Even if the Commission were to change its policy and rely on ATC plans to justify the spectrum award, there would be no reason to provide ICO's or TMI/TerreStar's 2

---

4 TMI's criticism of Inmarsat's plans to deploy ATC in conjunction with a qualified terrestrial partner, TMI Opposition at 11-12 & n.42, ring particularly hollow in light of press reports that TMI's affiliate, MSV, does not intend to deploy ATC alone. Jesse Drucker, *Catching a Wave, As Satellite Firms Move to Add Cellular Service, Critics Cry Foul*, Wall St. J., Feb. 9, 2006, at A1.

5 *See* TMI Opposition at 2-7; ICO Opposition at 3-5.

6 *See* Comments of Inmarsat in IB Docket No. 05-220 at 18-20 (citing *Flexibility for Delivery of Communications by MSS Providers*, 18 FCC Rcd 1962, 1974 ¶ 20, 2067 ¶ 215 (2003)).

7 *2 GHz Order* at ¶ 28, n.76; *see also id.* ¶ 42, n.116 ("we . . . do not rely on contentions that TMI needs additional spectrum deploy a network using ATC").

8 TMI Opposition at 3-4; ICO Opposition at 3.

9 *See 2 GHz Order* at ¶ 28, n.74.

GHz ATC plans any greater weight than Inmarsat's or Globalstar's. Neither ICO nor TerreStar has ever provided commercial satellite service, submitted an application to provide ATC, or committed to a specific ATC deployment schedule.

Spacecraft Design: TMI's reliance on the technical capabilities of its proposed spacecraft likewise is unavailing.[10] The Commission appropriately placed no weight on TMI's spacecraft design.[11] Commission policy is clear that TMI cannot "bootstrap" its way into more spectrum by building a larger spacecraft than the Commission has authorized.[12] Even if the Commission were to change that policy, the *2 GHz Order* does not address why TMI's and ICO's still-evolving 2 GHz networks would provide greater public interest benefits than Inmarsat's (or Globalstar's) 2 GHz spacecraft design.

Speed of Deployment: ICO attempts to justify its spectrum award by claiming that the decision "would ensure that the spectrum would be brought into use more quickly than if the spectrum were assigned to others."[13] ICO ignores the Commission's express rejection of "speed" as the basis for increasing ICO's and TMI's spectrum assignments, and the clear finding that increased speed of deployment would not outweigh giving other entities an opportunity to compete at 2 GHz.[14] In this regard, it bears emphasis that Inmarsat and Globalstar provided the Commission with proposals for expeditiously authorizing competing MSS providers, and each indicated that it could deploy its 2 GHz system by the end of the decade. Thus, even if speed of deployment were considered, others could be in a position to bring the returned spectrum into use soon after ICO and TMI are required to commence commercial 2 GHz service.

---

[10] TMI Opposition at 4.

[11] *2 GHz Order* at ¶ 42, n.116.

[12] *See* Inmarsat November 16 *Ex Parte* at 3; Inmarsat Reply Comments in IB Docket No. 05-221 at 37-40.

[13] ICO Opposition at 4-5.

[14] *2 GHz Order* at ¶ 57, n.173.

Other than these three factors (which do not justify the spectrum windfall), ICO's and TMI's Oppositions offer only vague platitudes about how MSS generally can provide public safety and rural broadband benefits. Again, there is no reason to believe that TMI and ICO are better suited to provide those benefits than the two other entities who stand ready to deploy at 2 GHz—Inmarsat and Globalstar. Moreover, as both Globalstar and CTIA aptly note, neither ICO nor TMI *is required* to serve the needs of first responders or to provide broadband services in rural areas.[15] Thus, there can be no basis to conclude that awarding more spectrum to ICO and TMI would better advance those goals than authorizing additional competitors in the band. To the contrary, as Inmarsat has explained, courts are clear in warning that the creation of a duopoly raises the risk that consumers will not receive the benefits that result from healthy competition.[16]

II. THE COMMISSION DID NOT ADDRESS RELEVANT ARGUMENTS AND PROPOSALS

In addition to the absence of substantiated reasoning, the *2 GHz Order* is legally deficient because it failed to address several relevant issues and alternative proposals.

First, the Commission failed to address the aspects of the 2 GHz band that make it uniquely suited among MSS bands to support high-data-rate, next-generation multimedia MSS offerings over mobile handheld devices, and that highlight the dangers of licensing to duopoly at 2 GHz.[17] Although the Commission concluded that 2 GHz MSS providers will be able to compete with MSS operators in other bands, the Commission simply did not address the converse: whether other MSS bands can support the same product offerings as those proposed at

---

[15] CTIA Comments at 6 (citing Globalstar Petition at 9). ICO's citation to the geographic coverage rules that apply to MSS providers, ICO Opposition at 3-4 (citing 47 C.F.R. § 25.143(b)(2)(iv)), is unavailing. There is no requirement that ICO and TMI actually provide broadband service, nor any specification of the data rates they must achieve or the other salient conditions on which they are to provide "broadband service" to "rural areas."

[16] Inmarsat Petition at 5-7.

[17] *See* Reply Comments of Inmarsat in IB Docket No. 05-221 at 17-22; Letter from John P. Janka to Marlene H. Dortch, IB Docket Nos. 05-220 and 05-221, at 8 (filed Sep. 28, 2005).

2 GHz, or whether MSS providers in other bands can compete with the MSS offerings possible at 2 GHz.[18]

ICO's cursory responses to these competitive issues do not bear scrutiny. The fact that Inmarsat will soon introduce BGAN service at L-Band in the United States does not obviate the need for further competition at 2 GHz. The future opportunities to deploy 2 GHz multimedia services to handheld MSS devices are far different than any of the services that Inmarsat is able to offer at L-Band today or in the near term. TMI admits as much.[19]

Nor is it relevant, as ICO asserts, that the Commission has not chosen to extend to the 2 GHz band the same licensing reform rules that apply in other bands.[20] The *policy* underlying those rules, first articulated in the *DIRECTV/EchoStar Hearing Designation Order,* applies with equal force here. In that case, the Commission recognized that the anticipated provision of broadband services in a nascent frequency band presents issues that warrant a much more sophisticated look at the definitions of markets and market participants than those assumed by ICO's and TMI's broad-brush assertions that all MSS frequency bands are fungible. In fact, one of the very reasons the Commission designated for hearing the proposed DIRECTV/EchoStar merger was a concern about the transaction's impact on the provision of broadband services by satellite in the nascent Ka band.[21] Nor is there any record basis here to conclude that the broadband MSS services to be provided in the nascent 2 GHz Band would be reasonably interchangeable with MSS services possible in other bands.[22] Nothing in the various

---

[18] *Cf.* TMI Opposition at 8.

[19] *Id.* at 6 (describing how TMI's 2 GHz system will provide services not available from Inmarsat or any other satellite provider).

[20] ICO Petition at 6-7.

[21] *See EchoStar Communications Corp.*, 17 FCC Rcd 20559, 20665-66 ¶ 289 (2002). Much as the 2 GHz band should be treated here, the Commission treated the nascent FSS Ka band as different from the existing, congested FSS bands in which satellite services already were being provided. *See id.* at 20650 ¶ 241.

[22] *See id.* at 20651 ¶ 244.

submissions of Professor Cowhey or Dr. Bruce Owen that TMI has submitted fills these gaps in the record.[23]

Second, the Commission ignored the fact that TMI is an incumbent MSS provider with close business ties to, and substantial overlapping ownership with, MSV. In fact, MSV does not dispute Globalstar's documentation of that relationship in its Petition.[24] Thus, the Commission's stated inclination to award the returned spectrum to "new entrants," rather than to existing MSS operators, is flatly inconsistent with the decision to award more 2 GHz spectrum to TMI.[25] In fact, despite the stated desire to facilitate new entrants, as a result of the *2 GHz Order*, the MSV/TMI ventures have approximately twice the amount of MSS spectrum over the Americas as any other provider.[26]

Contrary to what TMI asserts, the Commission did not "find" that TMI, TerreStar, and MSV's MSS businesses are "independent." The Commission's *silence* on this issue cannot be construed as a conclusion that TerreStar and MSV "are separately owned and managed, . . . will operate separate MSS systems, and that the two companies plan to compete against one another."[27] Nor could the Commission have assumed that the 2 GHz spectrum awarded to TMI ultimately would be held by an independent, new entrant. TMI still holds its 2 GHz authorization, and, as recent press releases reflect, the possible restructuring of the relationship between and among TMI, MSV, and TerreStar remains in flux.[28]

---

[23] *See* TMI Opposition at 9.

[24] Globalstar Petition at 18-21 (providing a detailed account of the interrelationship between TMI and MSV); Letter Comments of MSV at 1.

[25] *See 2 GHz Order* at ¶ 56 & n.173.

[26] Inmarsat Petition at 8-9.

[27] TMI Opposition at 12-13.

[28] *See* Press Release, Motient Corp., *Motient Corp. Updates Shareholders on MSV Roll-Up* (Feb. 2, 2006); Press Release, SkyTerra, *SkyTerra Issues Update on Proposed MSV and TerreStar Consolidation* (Feb. 2, 2006). Thus, this issue is not "mooted," as TMI asserts, by

Third, the Commission simply failed address several of Inmarsat's proposals that would both (i) avoid prematurely constraining access to the 2 GHz band to two entities who remain years away from deploying their systems, and (ii) allow the entry of a third (and possibly a fourth) 2 GHz competitor, without undue delay.[29] Inmarsat proposed incentives to ensure additional competitors would commence service as quickly as possible, and offered a way to increase TMI's and ICO's spectrum assignments to 2 x 6.67 MHz (as the Commission originally proposed) while also licensing additional competition in the band.[30] While TMI debates the merits of one of these proposals for the first time now,[31] ICO erroneously argues that the Commission was not required to address them at all.[32]

TMI criticizes Inmarsat's proposal whereby the award of 2 GHz spectrum rights would go to the first of several competitors to actually deploy a satellite system in the band.[33] Contrary to what TMI would have the Commission believe, this type of market-based solution already has proven effective in facilitating innovation in the satellite industry. Entrepreneurs have funded a number of initiatives that have competed for (and won) the $10 Million prize in the X Prize Cup, which was established to spur technological innovation in space.[34] If funding is available for speculative space ventures that seek to claim such a prize, there is no reason to assume that funding would not be readily available to pursue the spectrum "prize" that is 2 GHz.

Motient's recent announcement that it does not intend to increase its ownership in MSV. TMI Opposition at 13, n.51.

[29] *See* Inmarsat Petition at 12-13.

[30] *See id.* at 12-14.

[31] TMI Opposition at 15.

[32] ICO Opposition at 11.

[33] TMI Opposition at 15 (citing Inmarsat Petition at 13).

[34] *See* http://www.xprizefoundation.com; *SpaceShipOne captures X Prize, Privately funded craft reaches altitude requirement* (Oct. 4, 2004), available at http://www.cnn.com/2004/TECH/space/10/04/spaceshipone.attempt.cnn/index.html.

ICO is wrong that the Commission was not obliged to consider these types of proposals that Inmarsat submitted in response to the Commission's express solicitation.[35] Inmarsat proposals were "front-and-center" in its pleadings,[36] and were made in numerous *ex parte* presentations detailing alternatives to providing the entire 2 GHz band to ICO and TMI.[37] Inmarsat's alternatives are not, as ICO implies, the type of "rather subtle suggestion[s]" that the Commission may not be obligated to address.[38]

III. OTHER ISSUES

A. Inmarsat Has Standing

ICO is wrong that, in order to establish "standing," Inmarsat must show that it is an aggrieved party within the meaning of Section 316 of the Communications Act.[39] First, because the Commission recognized that Section 316 does not squarely apply to the *2 GHz Order*, the statutory strictures of Section 316 do not apply either.[40] Second, the Public Notices in these proceedings expressly solicited comment from a wide range of interested parties,[41] pursuant to which Inmarsat and a host of others actively participated, and Inmarsat submitted a competing proposal for its own 2 GHz MSS system. Finally, the *2 GHz Order* specifically allowed further challenges to be lodged pursuant to two different avenues – one for any licensee or permittee that believed that its license would be modified by the decision, and one for any

---

[35] *See* Public Notice, FCC 05-133 (rel. Jun. 29, 2005); Public Notice, FCC 05-134 (rel. Jun. 29, 2005).

[36] *See, e.g.,* Comments of Inmarsat in IB Docket No. 05-220 at 25-32; Reply Comments of Inmarsat in IB Docket No. 05-221 at 10-29.

[37] *See, e.g.,* Letter from John P. Janka to Marlene H. Dortch, File No. SAT-PPL-20050926-00184, IB Docket Nos. 05-220 and 05-221, at 2 (filed Aug. 24, 2005); Letter from John P. Janka to Marlene H. Dortch, IB Docket Nos. 05-220 and 05-221, at 10-12 (filed Sep. 28, 2005); Letter from John P. Janka to Marlene H. Dortch, SAT-PPL-20050926-00184, IB Docket Nos. 05-220 and 05-221, at 1 (filed Nov. 16, 2005).

[38] *See* ICO Opposition at 11 (citing *MCI Worldcom. v. FCC*, 209 F.3d 760 (D.C. Cir. 2000).

[39] *Id.* at 11-13.

[40] *2 GHz Order* at ¶ 2, n.3 & ¶ 18.

[41] *See id.* at ¶¶ 3-4.

entity that is entitled to seek reconsideration under Section 1.106 of the Commission's rules.[42] Inmarsat chose the latter procedural vehicle, which it has standing to pursue by virtue of its active participation in this proceeding and its PDR.[43]

B. Reconsideration of Inmarsat's Petition for Declaratory Ruling Is Warranted

In its Petition, Inmarsat urged, to the extent the Commission revisits its 2 GHz decision, that the Bureau reconsider the dismissal of Inmarsat's PDR to provide 2 GHz MSS service to the United States.[44] That result is warranted because the only reason Inmarsat's PDR was dismissed was that the entire 2 GHz band already had been awarded to TMI and ICO. Neither TMI nor ICO disputes that reconsideration of Inmarsat's PDR would be appropriate in these circumstances.[45] Thus, Inmarsat reiterates its request that the Commission reinstate Inmarsat's PDR and grant Inmarsat authority to compete as a third provider of 2 GHz MSS.

* * *

For the foregoing reasons, the Commission should reconsider its *2 GHz Order* and reinstate Inmarsat's Petition for Declaratory Ruling to provide 2 GHz MSS.

Respectfully submitted,

John P. Janka
Jeffrey A. Marks
LATHAM & WATKINS LLP
555 Eleventh Street, N.W., Suite 1000
Washington, D.C. 20004

Diane J. Cornell
Vice President, Government Affairs
INMARSAT, INC.
1100 Wilson Blvd, Suite 1425
Arlington, VA 22209

March 1, 2006

---

[42] *Id.* at ¶¶ 68-69.

[43] 47 C.F.R. § 1.106(b)(1).

[44] Inmarsat Petition at 16.

[45] TMI argues only that a decision *not* to reconsider the *2 GHz Order* would negate the need to reconsider dismissal of Inmarsat's market access petition. TMI Opposition at 15, n.56.

CERTIFICATE OF SERVICE

I, Jeffrey A. Marks, hereby certify that on March 1, 2006, I caused to be served a copy of the foregoing Consolidated Petition for Reconsideration by first-class U.S. mail (unless otherwise indicated) upon the following:

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Michael J. Copps
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Jonathan J. Adelstein
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Deborah Taylor Tate
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Fred Campbell
Legal Advisor to Chairman Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Emily Willeford
Deputy Chief of Staff and
Advisor to Chairman Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

John Giusti
Legal Advisor to Commissioner Copps
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Barry Ohlson
Legal Advisor to Commissioner Adelstein
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Aaron Goldberger
Legal Advisor to Deborah Taylor Tate
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Donald Abelson
Chief, International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Roderick Porter
Deputy Bureau Chief, International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Richard Engelman
Chief Engineer, International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Sam Feder
Acting General Counsel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Cassandra Thomas
Acting Chief
Satellite Division, International Division
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Gardner Foster
Legal Advisor, International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Karl Kensinger
Associate Division Chief
Satellite Division, International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Fern Jarmulnek
Deputy Chief
Satellite Division, International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

William Bell
Policy Branch
Satellite Division
International Division
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Steve Spaeth
Assistant Division Chief
Satellite Division, International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
By Electronic Mail

Christopher Guttman-McCabe
CTIA The Wireless Association
1400 16th Street, NW
Suite 600
Washington, DC 20036

Dale Branlund
Chief Technical Officer
BRN Phoenix, Inc.
329 N. Bernardo Avenue
Mountain View, CA 94043

Thomas Clemons
President
Alaska Association of Chiefs of Police
P.O. Box 167
Seward, AK 99664

Loren Leman
Chairman
Aerospace States Association
2200 Wilson Boulevard
Suite 102-249
Arlington, VA 22209

Suzanne Hutchings-Malloy
ICO Satellite Services, G.P.
2000 Pennsylvania Avenue, NW
Suite 4400
Washington, DC 20006

William T. Lake
William Cutler Pickering Hale and Dorr
2445 M Street, NW
Washington, DC 20037
Counsel for Globalstar, LLC

Carl R. Frank
Jennifer D. Hindin
Amy E. Bender
Kelin N. Kasler
Wiley Rein & Fielding
1776 K Street, NW
Washington, DC 20006
Counsel for Sirius Satellite Radio, Inc.

Nils Rydbeck, MSEE, PhD., Professor
Rydbeck Consulting
943 Flagship Drive
Summerland Key, FL 33042

Kathleen O'Brien Ham
Managing Director, Federal Regulatory Affairs
T-Mobile USA, Inc.
401 9th Street, NW
Suite 550
Washington, DC 20004

Thomas J. Sugrue
Vice President, Government Affairs
T-Mobile USA, Inc.
401 9th Street, NW
Suite 550
Washington, DC 20004

J. R. Carbonell
Carol L. Tacker
David G. Richards
Cingular Wireless, LLC
5565 Glenridge Connector
Suite 1700
Atlanta, GA 30342

Robert A. Calaff
Director, Federal Policy
T-Mobile USA, Inc.
401 9th Street, NW
Suite 550
Washington, DC 20004

Peter Pitsch
Communications Policy Director
Intel Government Affairs
Intel Corporation
1634 I Street, NW,
Suite 300
Washington, DC 20006

Dennis J. Burnett
Vice President
EADS North America Defense Company
1616 North Fort Myer Drive
Suite 1500
Arlington, VA 22209

Marjorie J. Dickman
Senior Attorney
Intel Government Affairs
Intel Corporation
1634 I Street, NW
Suite 300
Washington, DC 20006

Gregory C. Staple
Vinson & Elkins
1455 Pennsylvania Avenue, NW
Washington, DC 20004-1008
Counsel for TMI Communications and Company Limited Partnership

Oliver Badard
Vice President
Alcatel North America
11600 American Dream Way
9th Floor
Reston, VA 20193

Thomas M. Walsh
Spectrum Planning & Regulation
The Boeing Company – IDS/S&IS
Satellite Development Center
P.O. Box 92919
M/C W-S10-S343
Los Angeles, CA 90009-2919

Andrew Tang
Director Wireless Systems Analysis
Broadband Wireless Division
Intel Corporation
1634 I Street, NW
Suite 300
Washington, DC 20006

Jonathan D. Blake
Kurt A. Wimmer
Matthew S. DelNero
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004-2401
Counsel for TerreStar Networks, Inc.

Wayne V. Black
Keller and Heckman LLP
1001 G Street, NW
Suite 500 West
Washington, DC 20001
Counsel for American Petroleum Institute

Joseph P. Markoski
Bruce A. Olcott
Squire, Sanders & Dempsey LLP
1201 Pennsylvania Avenue, NW
P.O. Box 407
Washington, DC 20044-0407
Counsel for The Boeing Company

Henry Ruhwiedel
Ruhwiedel
5317 W 133rd
Crown Point, IN 46307

Chief Dan Flynn
Savannah Chatham Metropolitan Police
P.O. Box 8032
Savannah, GA 31412

Raymond G. Bender, Jr.
John S. Logan
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036
Counsel for Hughes Network Systems, LLC

Gerald C. Musarra
Vice President, Trade & Regulatory Affairs
Lockheed Martin Corporation
1500 Crystal Drive
Suite 300
Arlington, VA 22202

Laurence D. Atlas
Loral Space & Communications
1421 Jefferson Davis Highway
Suite 810
Arlington, VA 22202-3290

Carl Hofferberth
Microwave Circuits, Inc.
1611 Kemper Street
Lynchburg, VA 24501

Larry Hatch
Advanced Manufacturing Technology, Inc.
28 Millrace Drive
Lynchburg, VA 24501

David A. Cavossa
Executive Director
Satellite Industry Association
1730 M Street, N.W.
Suite 600
Washington, DC 20036

Christopher D. Imlay
General Counsel
Society of Broadcast Engineers, Inc.
c/o Booth, Freret, Imlay & Tepper
14356 Cape May Road
Silver Spring, MD 20904

Fred Fellmeth, Esq.
777 American Drive
Bensalem, PA 19020
Counsel for Total RF Marketing, Inc.

James R. Jenkins
Vice President, Legal and External Affairs
United States Cellular Corporation
8410 West Bryn Mawr
Chicago, IL 60631

George Y. Wheeler, Esq.
Holland & Knight LLP
2099 Pennsylvania Avenue, NW
Suite 100
Washington, DC 20006
Counsel for United States Cellular Corporation

Bert W. King
24 Jones Avenue
Greenville, SC 29601-4332

Chief Joseph G. Estey
President
International Association of Chiefs of Police
422 Winthrop Drive
Ithaca, NY 14850-1739

Chief Harold L. Hurt
President
Major Cities Chiefs Association
422 Winthrop Drive
Ithaca, NY 14850-1739

Sheriff James A. Karnes
President
Major County Sheriffs' Association
422 Winthrop Drive
Ithaca, NY 14850-1739

Sheriff Ted Sexton
President
National Sheriffs' Association
422 Winthrop Drive
Ithaca, NY 14850-1739

William K. Coulter, Esq.
DLA Piper Rudnick Gray Cary LLP
1200 19th Street, N.W.
Washington, DC 20036
Counsel for Mobile Satellite Users Association

Kumar Singarajah
Chairman
Satellite Action Plan Regulatory Group
Brussels
BELGIUM, DC 01040
By International Mail

Aarti Holla-Maini
Secretary General
European Satellite Operators Association
Brussels
BELGIUM, DC 01040
By International Mail

Robert A. Mazer, Esq.
R. Edward Price
Vinson & Elkins, LLP
1455 Pennsylvania Avenue, NW
Washington, DC 20004-1008
Counsel for SkyTerra Communications, Inc.

Lawrence R. Krevor
Vice President, Spectrum Strategy
Sprint Nextel Corporation
2001 Edmund Halley Drive
Reston, VA 20191

Robert S. Foosaner
Vice President and Chief Regulatory Officer
Sprint Nextel Corporation
2001 Edmund Halley Drive
Reston, VA 20191

Jill M. Lyon
Vice President and General Counsel
United Telecom Council
1901 Pennsylvania Avenue, NW
5th Floor
Washington, DC 20006

Trey Hanbury
Senior Counsel, Spectrum Strategy
Sprint Nextel Corporation
2001 Edmund Halley Drive
Reston, VA 20191

Kenneth L. Morckel
Director
Ohio Department of Public Safety
1970 West Broad Street
P.O. Box 182081
Columbus, OH 43218-2081

Lee Cobb
Executive Director
Virginia's Region 2000 Economic
Development Council
P.O. Box 937
Lynchburg, VA 24505

Cecilia Bernier
Town Manager
P.O. Drawer 669
Windermere, FL 34786

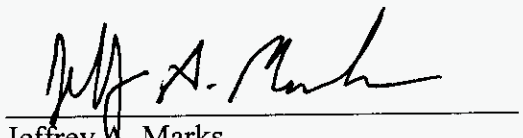
Lester B. Baird, Sr.
County Administrator
Hendry County, Florida
P.O. Box 2340
LaBelle, FL 33975-2340

Sheriff Robert J. McCabe
Norfolk Sheriff's Office
811 E. City Hall Avenue
Norfolk, VA 23510

Chief A.M. Jacocks, Jr.
Chief of Police
Building 11
Municipal Center
2509 Princess Anne Road
Virginia Beach, VA 23456

Carlton Stallings
President
Georgia Fraternal Order of Police
772 Maddox Drive
Suite 104
Ellijay, GA 30540

Randy S. Segal
Senior Vice President, General Counsel and Secretary
Mobile Satellite Ventures Subsidiary LLC
10802 Parkridge Boulevard
Reston, Virginia 20191



Jeffrey A. Marks