

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
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)
Annual Report to Congress on Status of) IB Docket No. 06-67
Competition in the Satellite Services Market)
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REPLY COMMENTS OF IRIDIUM SATELLITE, LLC

Iridium Satellite, LLC (“Iridium”) is pleased to submit these reply comments in response to the March 20, 2006 Public Notice of the International Bureau seeking information on the state of competition in the markets for domestic and international satellite services.¹ The comments in this proceeding indicate that there appears to be effective competition in the provision of most types of mobile-satellite services (“MSS”).² In addition to Iridium, there are multiple other facilities-based providers of MSS in the United States (Mobile Satellite Ventures (“MSV”), Inmarsat, Globalstar, Orbcomm), numerous MSS resellers, and terrestrial competitors.³

In the safety maritime market, however, Inmarsat continues to be dominant. As discussed in MSV’s comments, Inmarsat is currently the only MSS provider permitted by International Maritime Organization (IMO) regulations to provide Global Maritime Distress and Safety System (“GMDSS”). As a result, neither competition nor redundancy exists for the provision of safety maritime MSS. Moreover, international maritime regulations require all

¹ *IB Invites Comment for Annual Report to Congress on Status of Competition in the Satellite Services Market*, DA 06-635 (Mar. 20, 2006) (Public Notice) (“Notice”).

² *See* Comments of the Satellite Industry Association at 10; Comments of Mobile Satellite Ventures Subsidiary LLC at 2-4 (“MSV Comments”); Comments of Inmarsat plc at 5-6.

³ MSV Comments at 3.

cargo vessels over 300 gross tons and all passenger vessels that travel in international waters, irrespective of size, to carry GMDSS-capable distress and safety terminals.⁴ Inmarsat's uncontested provision of GMDSS service to these vessels gives it a competitive edge in the provision of non-safety maritime MSS services as well. Therefore, Iridium urges the FCC to require competition and redundancy of safety maritime services (GMDSS) through the licensing of such services on a national level and as a U.S. position at any IMO meetings.

Respectfully submitted,

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⁴ See *Inmarsat plc Prospectus* (June 1, 2005), at 31, available at [http://www.inmarsat.com/files/downloadnew.aspx?file=Investor Relations/Documents/Inmarsat plc Prospectus.pdf&language=EN&textonly=False](http://www.inmarsat.com/files/downloadnew.aspx?file=Investor%20Relations/Documents/Inmarsat%20plc%20Prospectus.pdf&language=EN&textonly=False).