

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

In the Matter of)
)
)
Annual Report to Congress on Status of) IB Docket No. 06-67
Competition in the Satellite Services Market)
)
)

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,

IRIDIUM SATELLITE, LLC

By: /s/ Donna Bethea-Murphy
Donna Bethea-Murphy
Vice President, Regulatory Engineering
6701 Democracy Blvd.
Suite 500
Bethesda, MD 20817
(301) 571-6200

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).

CERTIFICATE OF SERVICE

I, Christopher E. Ryan, do hereby certify that on May 4, 2006 I served a copy of the aforementioned **Reply Comments of Iridium Satellite LLC** upon the following parties either by U.S. first-class mail, postage pre-paid, or by electronic mail delivery (*):

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

Mr. Bruce Henoeh
Shulman, Rogers, Gandal, Porody & Ecker P.A.
11921 Rockville Pike
Suite 300
Rockville, MD 20852
Counsel for Stratos Global Corporation

Mr. David K. Moskowitz
Executive Vice President and General Counsel
EchoStar Satellite L.L.C.
9601 South Meridian Boulevard
Englewood, CO 80112

Pantelis Michalopoulos
Chung Hsiang Mah
Steptoe & Johnson LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036
Counsel for EchoStar Satellite L.L.C.

Jennifer A. Manner
Vice President, Regulatory Affairs
Mobile Satellite Ventures Subsidiary LLC
10802 Parkridge Boulevard
Reston, Virginia 20191

Bruce D. Jacobs
David S. Konczal
Jarrett S. Taubman
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, N.W.
Washington, DC 20037-1128
Counsel for Mobile Satellite Ventures LLC

Susan Eid
Vice President, Government Affairs
Stacy R. Fuller
Vice President, Regulatory Affairs
DirecTV, Inc.
444 North Capitol Street, N.W.
Suite 728
Washington, DC 20001

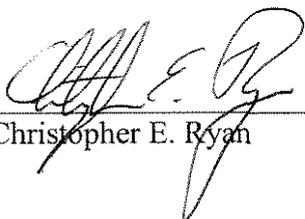
William M. Wiltshire
Michael Nilsson
Harris, Wiltshire & Grannis LLP
1200 Eighteenth Street, N.W.
Washington, DC 20036
Counsel for DirecTV, Inc.

Diane J. Cornell
Vice President, Government Affairs
Inmarsat, Inc.
1100 Wilson Boulevard
Suite 1425
Arlington, VA 22209

John P. Janka
Jeffrey A. Marks
Latham & Watkins LLP
555 Eleventh Street, N.W.
Suite 1000
Washington, DC 20004
Counsel for Inmarsat plc

Patricia Cooper* (via e-mail)
International Bureau
Federal Communications Commission
445 12th Street, N.W.
Washington, DC 20554
E-mail: Patricia.Cooper@fcc.gov

Best Copy and Printing, Inc.* (via e-mail)
445 12th Street, N.W.
Room CY-B402
Washington, DC 20554
E-mail: fcc@bcpiweb.com



Christopher E. Ryan