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March 10, 2008

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Via Electronic Filing

Marlene H. Dortch
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **Mobile Satellite Ventures Subsidiary LLC and TerreStar Networks Inc.
Ex Parte Letter
ET Docket No. 03-254**

Dear Ms. Dortch:

On March 7, 2008, Jennifer Manner of Mobile Satellite Ventures Subsidiary LLC (“MSV”), Douglas Brandon of TerreStar Networks Inc. (“TerreStar”), and Thomas Tycz of Goldberg, Godles, Wiener, and Wright, a consultant to TerreStar, met with Julius Knapp, Ira Keltz, Ron Repasi, Alan Stillwell, Geraldine Matise, Jamison Prime, and James Miller of the Office of Engineering and Technology. MSV and TerreStar discussed the attached talking points.

Please contact the undersigned with any questions regarding this matter.

Sincerely,

/s/

Tony Lin
*Counsel for Mobile Satellite Ventures
Subsidiary LLC*

Attachment

Marlene H. Dortch
March 7, 2008
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cc: Julius Knapp
Ira Keltz
Ron Repasi
Alan Stillwell
Geraldine Matise
Jamison Prime
James Miller

Mobile Satellite Ventures Subsidiary LLC and TerreStar Networks Inc.

Docket No. 03-254

The NPRM Properly Balanced the Interests of MSS and BAS/CARS

As the Commission tentatively concluded in the NPRM, it should continue to apply its general coordination procedures for coordination of 13 GHz GSO MSS uplink earth stations with mobile BAS/CARS operators. These coordination procedures have worked successfully in the past, and there is no evidence in the record that justifies deviating from established coordination-based licensing for GSO MSS gateway sites.

The proposal by the Society of Broadcast Engineers to prohibit new 13 GHz uplink earth stations within 150 km of the top-100 television markets is not necessary to protect mobile BAS/CARS operators and could have a devastating impact on existing and planned MSS systems.

- MSV has been operating 13 GHz uplinks in the Washington, DC market for 10 years without a single interference complaint. In connection with its next generation system, to be launched in 2009, MSV has successfully coordinated sites on the edges of the Dallas and San Francisco markets without any objections from broadcasters or others; applications to operate those facilities are now pending.
- TerreStar has successfully coordinated its 13 GHz uplink site in the North Las Vegas market; its application is also pending.
- MSV and TerreStar have no choice but to use the 13 GHz band for their Earth-to-space feederlinks; their feederlink facilities must be in areas that provide access to robust PSTN links and power facilities and permit suitable access for technical and operational staff; MSV and TerreStar chose sites away from downtown city centers and that offer natural shielding to prevent interference to BAS/CARS and have carved out over 60 MHz of spectrum (approximately 5 video ENG channels) to further enable BAS/CARS operations.
- In the handful of markets with MSS feederlink operations, BAS/CARS operators can work around the feederlink sites, since the GSO earth stations present a limited, stable, and predictable area and level of interference, and use only a portion of the available spectrum.
- SBE's proposed 150 km exclusion zones would have the net effect of excluding satellite gateways in nearly the entire eastern half of the United States and drastically limiting suitable locations in the rest of the country.