

March 26, 2008

Via Hand Delivery

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

**Re: Thirteenth Annual Report and Analysis of Competitive Market Conditions
with Respect to Commercial Mobile Services
WT Docket No. 08-27**

Dear Ms. Dortch:

In the above-referenced proceeding, the Wireless Telecommunications Bureau (“WTB”) is soliciting data and information to assist in the preparation of its *Thirteenth Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services* (“*Thirteenth Annual Report*”).¹ Among other things, the WTB seeks data on the following from providers of Mobile Satellite Services (“MSS”): service price, handset price, and coverage. *Public Notice* at 4.

Mobile Satellite Ventures Subsidiary LLC (“MSV”) was authorized by the Commission in 1989 to construct, launch, and operate an MSS system in the L band.² MSV has joined in two separate comments filed today in this proceeding, one regarding the provision of MSS³ and one regarding MSS supplemented with in-band terrestrial facilities, called an Ancillary Terrestrial Component.⁴ MSV’s licensed satellite (called “AMSC-1”) was launched in 1995, and MSV began offering service in 1996. Today, MSV offers a full range of mobile satellite services, including voice and data, using both its own U.S.-licensed satellite and the Canadian-licensed L band satellite licensed to Mobile Satellite Ventures (Canada) Inc. (“MSV Canada”). MSV is a

¹ See “*Wireless Telecommunications Bureau Seeks Comment on Commercial Mobile Radio Services Market Competition*,” DA 08-453, WT Docket No. 08-27 (February 25, 2008) (“*Public Notice*”).

² *Order and Authorization*, 4 FCC Rcd 6041 (1989); *remanded by Aeronautical Radio, Inc. v. FCC*, 928 F.2d 428 (D.C. Cir. 1991); *Final Decision on Remand*, 7 FCC Rcd 266 (1992); *aff’d*, *Aeronautical Radio, Inc. v. FCC*, 983 F.2d 275 (D.C. Cir. 1993); *see also AMSC Subsidiary Corporation, Memorandum Opinion and Order*, 8 FCC Rcd 4040 (1993).

³ See Comments of the Satellite Industry Association (March 26, 2008).

⁴ See Comments of the Mobile Satellite Service Providers (March 26, 2008).

leader in providing interoperable communications service in the North American market to public safety and government users. Its SMART, G-SMART and related programs provide national or area-wide talk group functionality at no additional charge to MSV's users.

MSV currently provides switched and packet data services to approximately 33,000 units (including 12,364 mobile data units) through wholesale and retail sales channel that includes a direct sales force, dealers, and resellers. Many of these users are federal, state, and local agencies involved in public safety and security that depend on the MSV system for redundant and ubiquitous wireless services during daily operations and in the case of emergencies. Attached as Exhibit A is price and coverage information for the services that MSV offers directly to end-user consumers. MSV also sells bulk capacity on a wholesale basis to private network carrier partners that in turn provide services directly to end-user customers. There are approximately 270,000 units in service on the MSV system through these indirect channels. The information in Exhibit A does not reflect information regarding service and equipment offered to the public by these third parties.

As explained in separate comments filed today,⁵ MSV and MSV Canada are in the process of constructing two next-generation MSS satellites that will be supplemented with an Ancillary Terrestrial Component ("ATC").⁶ These satellites will be used to provide advanced mobile voice and broadband services to devices that are virtually identical to cell phone handsets in terms of aesthetics, cost, and functionality. MSV and MSV Canada are planning to launch these satellites beginning in 2009 in advance of the applicable regulatory milestone deadlines.

As part of its next-generation MSS/ATC system, MSV will deploy an Integrated Service Delivery Framework. This innovative OSS/BSS system will enable deep interconnection with MSV's network and provide an applications development environment far more streamlined than that provided in any large-scale satellite or terrestrial network today. MSV believes that this systems architecture will enhance partner functionality, wholesale appeal and interoperability of its new network.

Additionally, in December 2007, MSV, MSV Canada, and Inmarsat Global Limited executed a comprehensive cooperative agreement for L-Band operations in North America. The agreement is intended to enable the re-banding and efficient reuse of a substantial segment of North American L-Band radio spectrum for the benefit of the companies and their current and future customers and partners. Under the agreement, MSV will be able to make more extensive use of available L-Band spectrum for MSS/ATC than is possible today.

⁵ See Comments of the Mobile Satellite Service Providers (March 26, 2008).

⁶ See *Mobile Satellite Ventures Subsidiary LLC*, 20 FCC Rcd 9752 (2005).

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Very truly yours,

/s/

Jennifer A. Manner
Vice President, Regulatory Affairs
MOBILE SATELLITE VENTURES SUBSIDIARY LLC
10802 Parkridge Boulevard
Reston, Virginia 20191

cc: Ben Freeman, FCC
Heidi Kroll, FCC

Exhibit A

I. Prices for MSS Offered by MSV Directly to End-User Customers

A. Retail Telephony Rates

Charges Per Satellite Radio Telephony - Rate Plan Code	915	916	914	913
Monthly Access Fee	\$25	\$35	\$100	\$175
Minutes Included	0	30	60	175

B. Retail Push-to-Talk (“PTT”) Rates

Charges Per Satellite Radio	Regional 2-beams	CONUS 3-beams	All Regions 5-beams
PTT - Rate Plan Code	908	928	929
Talk group access/month	\$69	\$99	\$129
PTT minutes	Unlimited	Unlimited	Unlimited
Telephony Minute rate	\$1.19	\$1.19	\$1.19

II. Price(s) for MSS Handset(s) Currently Offered by MSV to End-User Customers

MSAT-G2 Mobile Satellite Radio = \$4,800

III. MSV’s MSS Coverage

MSV provides wide-area wireless communications on land, sea or in the air, in North America, Central America, northern South America (Venezuela and Colombia), the Caribbean and up to 250 miles offshore.

IV. Number of Subscribers for MSS Offered Directly by MSV to End-User Customers

Subscribers = 20,047 (not including mobile data subscribers)