

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

In the matter of)
)
Report to Congress Regarding) IB Docket No. 08-38
the ORBIT Act)

COMMENTS OF INMARSAT PLC

Inmarsat plc (“Inmarsat”) submits these Comments in response to the Public Notice inviting input to be reflected in the Commission’s progress report to Congress on implementing the Open-Market Reorganization for the Betterment of International Telecommunications Act (the “ORBIT Act”).¹ The purpose of the ORBIT Act is to “promote a fully competitive global market for satellite communications services for the benefit of consumers and providers of satellite services and equipment by fully privatizing...INTELSAT and Inmarsat.”²

Inmarsat converted from an intergovernmental organization (“IGO”) to a private company in 1999 in a manner that was ORBIT Act-compliant.³ In June 2005, the Commission found that Inmarsat had satisfied the requirement to effectuate a substantial dilution of former Signatory financial interests in the company.⁴ Just days later, Inmarsat reduced former signatory and foreign government ownership even further, by completing one of the most successful equity IPOs by a satellite services company. Today, Inmarsat’s shares are traded on the London Stock

¹ Public Notice, Report No. SPB 225, DA 08-593 (rel. Mar. 18, 2008).

² *Id.* at 1; *see also* ORBIT Act, Pub. L. No. 106-180, 114 Stat 48, §2 (2000)

³ *See Comsat Corp.d/b/a Comsat Mobile Communications et.al.* 16 FCC Rcd 21661 (2001)(“Comsat”).

⁴ *Inmarsat Group Holdings Limited, Petition for Declaratory Ruling Pursuant to Section 621(5)(F) of the ORBIT Act*, 20 FCC Rcd 11366 (2005).

Exchange and no former Inmarsat Signatory owns five percent or more of the company and the aggregate ownership by foreign governments is nominal.

Inmarsat, in an effort to respond to aggressive, highly competitive market forces, has continued to invest in new technologies for the diverse mobile satellite service (MSS) customer base. Over the last several years, Inmarsat has invested well over \$1.5 billion in the deployment of its fourth-generation, Inmarsat 4 (“I-4”) satellite network, which is today providing innovative MSS services to the United States and globally on one of the most advanced mobile commercial communications satellites now in orbit. Inmarsat expects to launch the third of its fourth generation satellites, the I4F3, in the near future, completing world-wide coverage for our broadband capabilities, including Broadband Global Area Network (BGAN). In addition, Inmarsat is constructing and has sought Commission authorization for a Satellite Access Station in Paumalu, Hawaii to connect user terminal traffic to the public switched network and the Internet.

In order to remain competitive in the dynamic MSS market, Inmarsat’s I-4 fleet has been designed and adapted to support a new class of novel IP-based communications, including BGAN service. Using highly portable and easily deployed “notebook sized” antennas that are one-third the size, weight, and price of traditional Inmarsat terminals, BGAN provides voice and broadband service at speeds of almost half a megabit per second. In 2007, Inmarsat launched companion BGAN services for aeronautical and maritime customers, known as SwiftBroadband and FleetBroadband. Inmarsat will introduce world-wide Global Satellite Phone Service (GSPS) over its I4 geostationary fleet with a modernized handset. This device is being optimized to operate over the I-4 network, will support both MSS and GSM service, and is expected to be available in the United States in 2009.

Inmarsat respectfully submits the above information to assist the Commission in preparing its forthcoming report to Congress.

Respectfully submitted,

/s/

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