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July 21, 2008

By Electronic Filing (ECFS)

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

Re: Mobile Satellite Ventures Subsidiary LLC
***Ex Parte* Letter**
Docket Nos. 06-150 and 06-229

Dear Ms. Dortch:

On July 16, 2008, Jennifer Manner of Mobile Satellite Ventures Subsidiary LLC ("MSV"), Bruce Jacobs, counsel for MSV, and Michael Meece, consultant for MSV, met with Aaron Goldberger, Legal Advisor for Chairman Martin, and Brent Greenfield of the Wireless Telecommunications Bureau. The parties discussed the Comments filed by MSV in the above-referenced proceedings, and MSV provided the attached handout.

Very truly yours,

/s/

Tony Lin

Attachment

cc: Aaron Goldberger
Brent Greenfield

Integrating Satellite Service into the
New Public Safety Wireless Broadband Network

There is an urgent need for a nationwide, interoperable wireless public safety broadband network. Creating a public/private partnership with 700 MHz spectrum is a potentially effective way to promote the deployment and operation of such a network.

Integrating satellite service into the 700 MHz public safety network is the best way to serve rural and remote areas and provide communications redundancy needed to make the network truly reliable during disasters when any terrestrial network may be impaired or unavailable.

True Nationwide Coverage. Satellites are the only technology available capable of providing true nationwide coverage. Even the FCC's existing requirement for coverage of 99.3% of the US population could leave more than 2 million square miles (roughly 2/3 of the US landmass) uncovered by terrestrial facilities.

Superior Reliability. The Katrina Independent Panel found that satellite networks were the least disrupted of all communications networks and remained available and usable throughout the affected region.

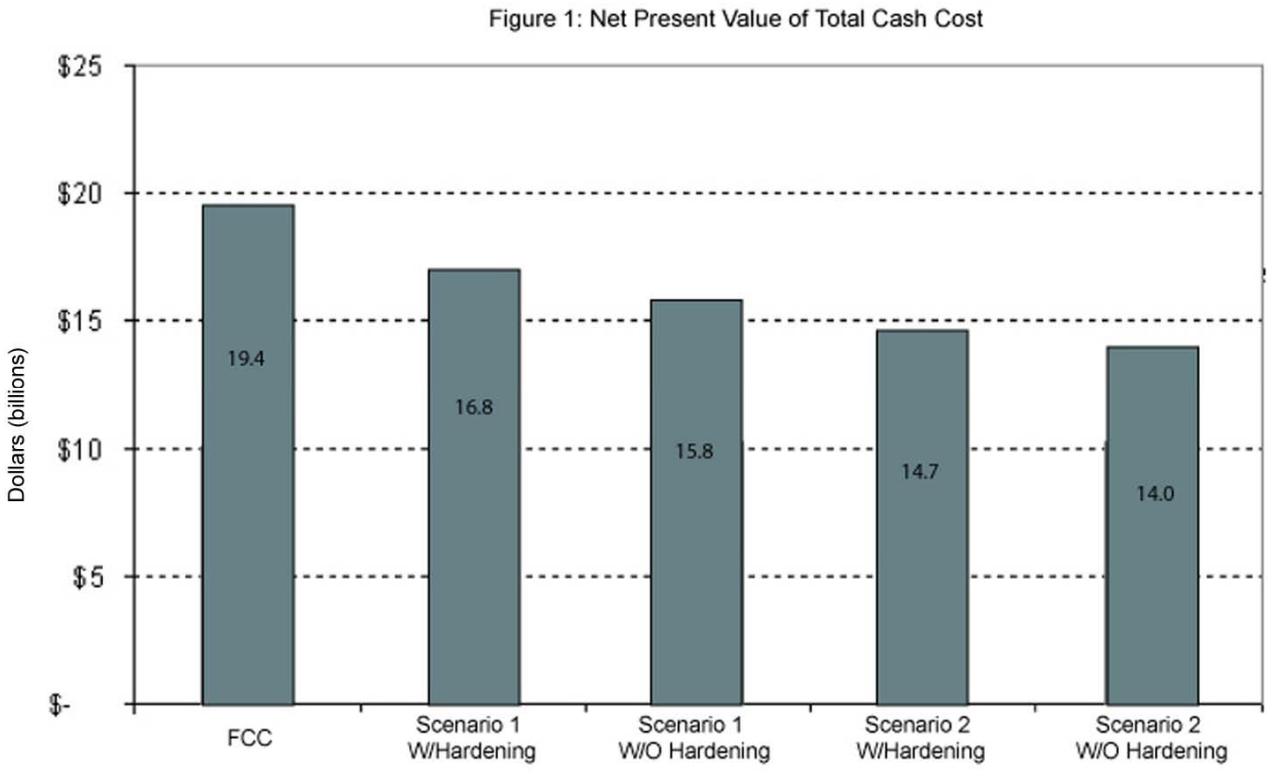
Low Cost. Handset manufacturers can add satellite capability to their 700 MHz devices at a cost of no more than roughly $5. Thus, for example, four million first responders could gain truly reliable, nationwide interoperability at a marginal manufacturer cost of no more than roughly $20 million. There is no less expensive or more efficient way to provide nationwide coverage and interoperability to millions of first responders

Enormous Savings. Relying on satellite service permits the FCC to remove billions of dollars in construction and operating costs from its minimum buildout and hardening requirements while actually increasing the availability of service. (The attached chart shows the potential magnitude of the savings under various scenarios.) Such a change will greatly improve the prospects for a successful re-auction and for a viable D block business.

MSV therefore proposes that:

1. The FCC mandate that all public safety devices deployed on the 700 MHz public safety block be satellite-enabled.

2. The FCC give the D block licensee the option of using a qualified satellite service to substitute for some minimal reduction in its coverage and hardening requirements. To qualify as a substitute, the satellite service must be able to provide a reasonable amount of capacity, a sufficiently strong and reliable signal to 700 MHz public safety radios, and priority access.



FCC (baseline) – existing minimum coverage and hardening requirements

Scenario 1 – coverage requirement of 99.3% of US population stretched from 10 years to 12 years

Scenario 2 – maximum coverage requirement changed to 95% of US population

Figure 2: US Land Area Covered vs Population

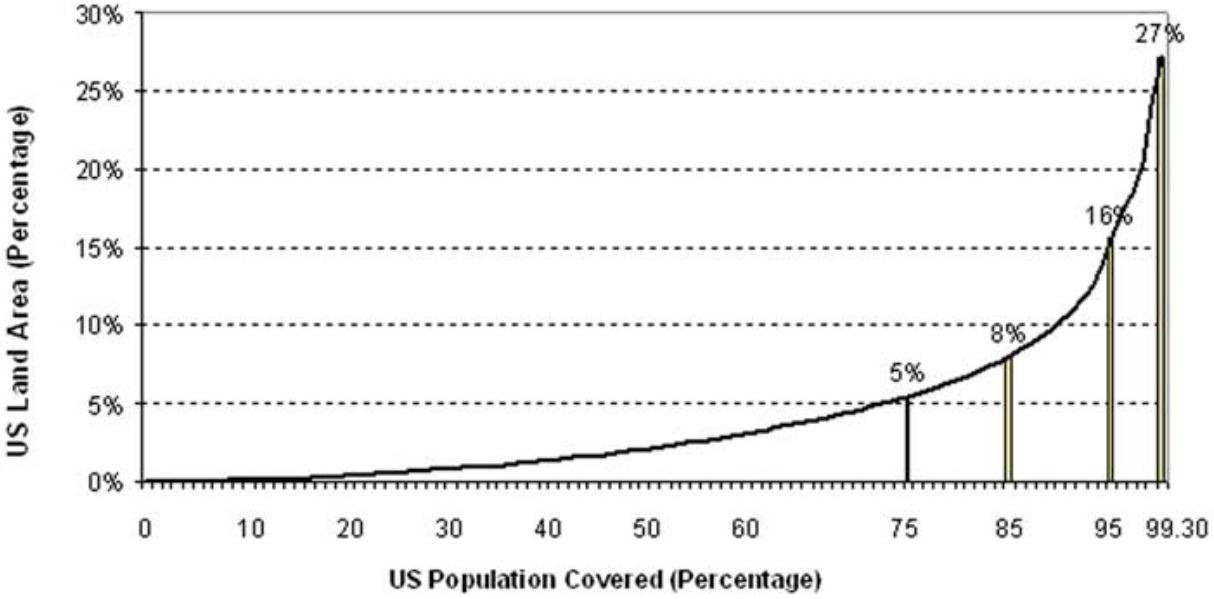
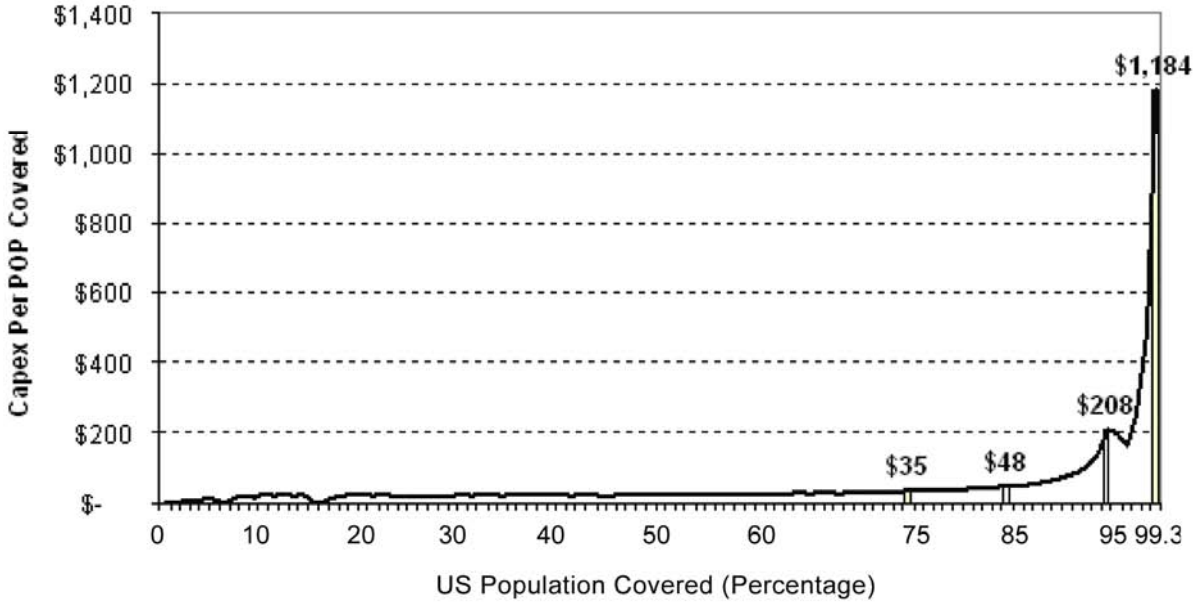



Figure 3: Incremental Capex vs Population covered