

January 27, 2009

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

**Re: DA 08-2574**  
**IB Docket No. 08-232**

Dear Ms. Dortch:

On January 26, 2009, L. Scott Trainum, Armin Jabs, Ann Brewer, Susan Philips of International Communications Group, Inc ("ICG") and the undersigned spoke with Renee Crittendon of the office of Commissioner Adelstein and Angela Giancarlo of the office of Commissioner McDowell regarding the Transfer of Control Application filed by Iridium Holdings LLC and Iridium Carrier Holdings LLC ("Iridium").

As an initial matter, ICG reiterated its position that the grant of the application will result in more robust Iridium service and is therefore in the public interest. However, Iridium has a unique global footprint not enjoyed by any competitor and owns and controls both the network and the hardware needed to access the system. Thus, without narrowly-tailored conditions to ensure that third-parties have access to needed technical specifications, the ability of third parties to continue to provide competitive value-added applications to consumers will be threatened.

Companies like ICG provide innovative value-added applications for consumers that meet their very specific needs. ICG, for example, provides complex solutions for the aeronautical industry, which has very demanding technical standards. Without sufficient information from Iridium, they cannot assure the Federal Aviation Association ("FAA") that their standards have been met. The end result could be that the only supplier in a specific market would be Iridium, and the consumer benefits of a highly competitive market will be lost.

Iridium's concerns regarding breaches in national security, highly confidential information or trade secrets are not a basis for denying access to all necessary technical information. Confidential licensing agreements, for example, are a commonly used mechanism for protecting sensitive information.

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ICG reiterated its request that the FCC prohibit Iridium, either through conditions to its license or voluntary commitments, from entering into exclusive arrangements and to require Iridium to provide necessary technical information so that third-parties can continue to provide value-added services and unique product solutions to consumers that meet their highly specific needs.

Please direct any questions to the undersigned.

Respectfully submitted,

A handwritten signature in black ink that reads "Marsha MacBride". The signature is written in a cursive, flowing style.

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