

*Marsha J. MacBride*  
*Attorney at Law*  
1219 Earnestine Street  
McLean, Virginia 22101  
Phone: 703.821.4053  
Fax: 703.821.4053  
[marshamacbride@yahoo.com](mailto:marshamacbride@yahoo.com)

February 9, 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 February 6, 2009, L. Scott Trainum, Armin Jabs and Ann Brewer of International Communications Group, Inc ("ICG") and the undersigned spoke with John Giusti, Narda Jones and Francis Gutierrez of the FCC's International Bureau and Paul Murray of the Office of Acting Chairman Capps 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 a more robust Iridium service and is therefore in the public interest.

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.

Because of Iridium's unique global network, not replicated by any competitor, and the fact that it has sole control over both its network and the hardware needed to access the system renders Iridium a "de facto" monopoly with the requisite monopoly power to exclude or otherwise eliminate any competition in the value-added market. For these reasons, the ICG's proposed conditions are unique to this transaction and do not apply readily to other network access issues pending before the FCC.

Ms. Marlene H. Dortch  
February 9, 2009  
Page 2

Finally, 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.

As a result of the foregoing, the FCC should 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 to consumers that meet their highly specific needs.

Please direct any questions to the undersigned.

Respectfully submitted,

A handwritten signature in cursive script that reads "Marsha J. MacBride". The signature is written in black ink and is positioned above the printed name.

Marsha J. MacBride