



John F. Provenzano
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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Iridium Holdings/GHL Acquisition (GHQ/Iridium Communications)
IB DO No. 08-232 (DA 08-2574 Rel. Nov. 26, 2008)
ITC-T/C-20081021-00471
ITC-T/C-20081021-01350, -01351, -01352, -01353
SAT-T/C-20081021-00208

Dear Ms. Dortch :

Rockwell Collins, Inc. (RCI), who recently signed a private label agreement with International Communications Group, Inc. (ICG), would like to take the opportunity to voice support for Iridium's transfer of control applications to the Federal Communications Commission (FCC). RCI supports the issuance of an FCC grant as it will create a stronger financial structure for Iridium, however, RCI respectfully requests safeguards be adopted to ensure continued third-party innovation and competition with respect to mobile satellite services (MSS).

Currently, none of the five existing MSS operating in the United States offers global MSS in direct competition with Iridium; as Iridium "is the only provider of truly global satellite voice and data communications solutions with complete coverage of the entire Earth, including oceans, airways and even Polar Regions." Due to Iridium's complete global coverage, up to 75% decreased cost for equipment and installation compared to other MSS providers, and substantial reduction in recurring service costs, RCI believes it would be in the public's best interest if there was continued common carrier service.

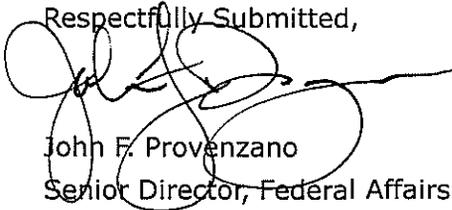
RCI strongly recommends that Iridium be obligated to provide open access to the technical specifications of it's terminal equipment, handsets, and devices to permit third-party developers to design and market competitive equipment and value-added services; and Iridium be prevented from entering into handset or terminal equipment licensing or manufacturing agreements, or any other agreements (exclusive or otherwise) that have the

effect of preventing third-party handsets, equipment, devices and value-added services from reaching MSS consumers.

As the FCC has recognized the benefits of open network access and competition in equipment design and manufacture, MSS consumers should have the opportunity to choose equipment or devices which are bundled with Iridium service, as long as there is no harm to the Iridium network by such equipment or devices. In the past, the FCC has applied pro-competition policies in the public interest approvals such as XM/Sirius merger¹ and Sprint/ClearWire joint venture², as well as entrants of the 700 MHz Band C Block spectrum³.

Exclusive arrangements would create an anticompetitive environment that would limit innovation and would not be in the best interest of the public. RCI respectfully requests that the New Iridium be obligated to provide open network access to third-party developers and value-added service providers. These conditions will ensure continued innovation and competition in the MSS market.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'John F. Provenzano', is written over the typed name and title. The signature is stylized and somewhat cursive.

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¹ Conditioning merger on open access to satellite radio device manufacturers, and prohibition against the merged entity "preventing such devices, and any features such devices might contain, from reaching consumers, through exclusive contracts or otherwise".

² Conditioning approval of proposed transaction on voluntary network openness.

³ Requiring licensees in the 700 MHz band C Block "to allow customers, device manufacturers, third-party application developers, and others to use or develop the devices and applications of their choice".