

August 4, 2010

**FILED ELECTRONICALLY**

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

**Re: Notice of Ex Parte Presentation**

**WT Docket No. 02-55  
ET Docket Nos. 00-258 and 95-18**

**New DBSD Satellite Services G.P., Applications for Transfer of Control  
File Nos. SAT-T/C-20091211-00144, et al.**

Dear Ms. Dortch:

On August 3, 2010, R. Gerard Salemme of ICO Global Communications (Holdings) Limited (“ICO Global”) and the undersigned met with Julius Knapp, Bruce Romano, Geraldine Maise, Jamison Prime, and Nick Oros of the Office of Engineering and Technology regarding the above-captioned proceedings.

During the meeting, we explained that extending an MSS licensee’s liability for relocation reimbursement costs to a shareholder of or investor in the licensee would be impermissible retroactive rulemaking and would violate the principle that a corporation cannot be held liable for the obligations of separate corporate entities in which it holds an ownership interest. We reviewed the arguments contained in ICO Global’s August 2 ex parte on these matters and provided copies of the ex parte to the Commission participants in the meeting.

We also pointed out that not only would it be legally impermissible to impose liability for relocation costs on ICO Global, it would be grossly unfair. ICO Global (even as the parent company of DBSD, fka ICO North America) never utilized the BAS spectrum or received any benefit from Sprint’s band clearing activities, and it never will now that it has lost all but a minimal interest in DBSD.

Pursuant to section 1.1206(b) of the Commission’s rules, an electronic copy of this letter is being filed electronically with the Office of the Secretary and served electronically on the Commission participants in the meeting.

**Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.**

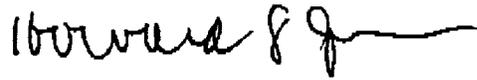
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

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Should there be any questions regarding this matter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard J. Symons", with a long horizontal flourish extending to the right.

Howard J. Symons

cc: Julius Knapp  
Bruce Romano  
Geraldine Matise  
Jamison Prime  
Nick Oros