Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of	)	
	)	
Report to Congress Regarding the ORBIT Act	)	IB Docket No. 12-19
	)	

COMMENTS OF INMARSAT PLC

Inmarsat plc ("Inmarsat") submits these Comments in response to the Public Notice inviting input to be reflected in the Commission's progress report to Congress on implementing the Open-Market Reorganization for the Betterment of International Telecommunications Act (the "ORBIT Act").[1] The purpose of the ORBIT Act is to "promote a fully competitive global market for satellite communications services for the benefit of consumers and providers of satellite services and equipment by fully privatizing...INTELSAT and Inmarsat."[2]

Inmarsat converted from an intergovernmental organization ("IGO") to a private company in 1999 in a manner that was ORBIT Act-compliant.[3] In June 2005, the Commission found that Inmarsat had satisfied the requirement to effectuate a substantial dilution of former Signatory financial interests in the company.[4] Just days later, Inmarsat reduced former signatory and foreign government ownership even further, by completing one of the most successful equity IPOs by a satellite services company. Today, Inmarsat's shares are traded on the London Stock

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1 Public Notice, Report No. SPB-240, DA 12-82 (rel. Feb. 3, 2012).

2 *Id.* at 1; *see also* ORBIT Act, Pub. L. No. 106-180, 114 Stat 48, §2 (2000).

3 *See Comsat Corp. d/b/a Comsat Mobile Communications et.al.* 16 FCC Rcd 21661 (2001)("Comsat").

4 *Inmarsat Group Holdings Limited, Petition for Declaratory Ruling Pursuant to Section 621(5)(F) of the ORBIT Act,* 20 FCC Rcd 11366 (2005).

Exchange and no former Inmarsat Signatory owns five percent or more of the company and the aggregate ownership by foreign governments is nominal.

Inmarsat, in an effort to respond to aggressive, highly competitive market forces, has continued to invest in new technologies for the diverse mobile satellite service customer base. Over the last several years, Inmarsat has invested well over $1.5 billion in the deployment of its fourth-generation, Inmarsat 4 ("I-4") satellite network, which is today providing innovative mobile satellite services to the United States and globally on one of the most advanced mobile commercial communications satellites now in orbit. In 2008, Inmarsat launched the third of its fourth generation satellites, the I4F3, completing world-wide coverage for our broadband capabilities, including Broadband Global Area Network (BGAN). After the successful launch of the I4F3, Inmarsat undertook a major satellite fleet repositioning process that is now providing more efficient coverage for Inmarsat users.[5] In addition, Inmarsat completed construction of and was granted Commission authorization for a Satellite Access Station in Paumalu, Hawaii to connect user terminal traffic to the public switched network and the Internet.[6]

In order to remain competitive in today's current mobile satellite market, Inmarsat's I-4 fleet is continuing to adapt to support IP-based communications.[7] Using highly portable and easily deployed "notebook sized" antennas that are one-third the size, weight, and price of traditional Inmarsat terminals, BGAN provides voice and broadband service at speeds of almost

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5 *See*, Inmarsat Press Release, Inmarsat Broadband Goes Global (Feb. 26, 2009) announcing completing of global coverage for Inmarsat broadband services.

6 *See*, File No. SES-LIC-20080306-00242, Call Sign E080059 (granted Dec.18, 2008); File No. SES-MFS-20080228-00207, Call Sign KA 25 (granted Dec. 18, 2008).

7 *See*, Satnews Daily, Inmarsat Investigating IPv6 (Jun. 22, 2011).

half a megabit per second. End users continue to deploy BGAN in new and innovate ways.[8] Inmarsat and its distributors continue to evolve the current service to better meet the needs of existing and potential customers.[9]

Inmarsat has a formal agreement with the International Telecommunication Union to enable the United Nations agency to help countries better prepare for and respond during disasters.[10] Inmarsat's BGAN technology has played a critical role supporting government and non-governmental agencies, such as Télécoms Sans Frontières and the American Red Cross, as well as international news organizations in response to global disasters including the recent floods in Thailand, the Libyan conflict, and recent earthquakes.[11]

In addition, Inmarsat continues to introduce entirely new services over L-band, including the IsatPhone Pro handheld and Low Data Rate services. In 2010, Inmarsat launched a worldwide Global Satellite Phone Service over its I-4 geostationary fleet with a modernized handset called the IsatPhone Pro.[12] The IsatPhone Pro is the first handset to be purpose-built for the Inmarsat network, and is the first product in Inmarsat's GSPS family. The IsatPhone Pro has been optimized to deliver superior performance over Inmarsat's advanced mobile satellite network, and supports satellite telephony, including circuit switched voice, voicemail, Bluetooth for hands free

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8 *See*, Inmarsat News, Borneo expedition shares experiences with videoconferences (Jan. 17, 2011); Public enrolled to search for Genghis Khan's tomb (Jun. 8, 2011); Mobile studio beams live broadcasts from Paris festival (Oct. 4, 2011).

9 *See,* Inmarsat News, New low data rate service to offer greater M2M capacity (Mar. 17, 2011); Emirates launches Airbus A380 Wi-Fi internet connectivity (Dec. 12, 2011).

10 *See,* Inmarsat News, ITU deploys BGAN for telemedicine after Pakistan floods (Nov. 26, 2011); *see also*, ITU Newsroom – Press Release, ITU deploys satellite communication equipment in Japan (Mar. 16, 2011).

11 *See,* Inmarsat News, TSF helps UN and Colombian government combat floods (Jan. 5, 2011); Christchurch earthquake relief efforts trigger data surge (Feb. 25, 2011); TSF restores links for Libyan hospitals and Red Crescent (Sep. 1, 2011); TSF deploys to Thailand after flood disaster (Oct. 17, 2011); Lifeline for Madagascar's victims of Cyclone Giovanna (Feb. 24, 2012).

12 *See*, Inmarsat News, Inmarsat launches its first global handheld, IsatPhone Pro (Jun. 15, 2010).

use, text and email messaging, and supplementary services. Since its release in June 2010, the IsatPhone Pro has provided superior service when compared with the competition and proven to be invaluable in disaster and emergency situations across the globe.[13] Inmarsat also launched a global fixed satellite phone service in 2011, the IsatPhone Link, which is based on the IsatPhone Pro.[14]

Inmarsat's land portfolio has and will continue to grow in low data rate services.[15] The low data rate services offered provide a variety of tracking, monitoring, and M2M applications. Inmarsat's current portfolio includes IsatM2M and the IsatData Pro service, as well as the BGAN M2M service for monitoring and Supervisory Control and Data Acquisition (SCADA) solutions.[16] More recently, energy utilities around the world are developing "smart" electricity grids that will facilitate greater control over energy consumption and costs. Inmarsat is able to provide a low data rate satellite service that can effectively extend a utility's IP network to ensure complete coverage across its service territory, effectively closing the gap in terrestrial network coverage.[17]

To respond to the growing need for additional bandwidth in the market, Inmarsat announced in August 2010 a $1.2 billion investment into three new I-5 Ka-band satellites to be

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[13] *See*, Inmarsat News, Independent study validates claims for IsatPhone Pro (Feb. 4, 2011); IsatPhone Pro proves invaluable during Queensland cyclone (Feb. 9, 2011); Family fishing trip tragedy averted thanks to IsatPhone Pro (Nov. 30, 2011).

[14] *See*, Inmarsat News, IsatPhone Link brings new voice service to fixed locations (Jun. 23, 2011).

[15] *See*, Inmarsat News,SkyWave tracker saves Heineken Cape to Rio yacht (Apr. 6, 2011).

[16] *See*, Inmarsat News, Launch of IsatData Pro increases capabilities in M2M markets (Aug, 5, 2011); New BGAN M2M lets machines talk across globe (Jan. 26, 2012)

[17] *See*, UTC Journal, Utilities Find Solutions in Satellite Communications (4th Quarter 2011); Satellite Today, Hughes to Develop M2M BGAN Terminal for Inmarsat (Oct. 7, 2011).

launched starting in 2013 for a new high bandwidth service called Global Xpress.[18] In the preparation for the new service, Inmarsat has contracted with iDirect to provide the ground infrastructure and core module technology to integrate into the new satellite terminals.[19] In October 2011, Inmarsat announced that they had completed the Critical Design Review for the Inmarsat-5 satellites, bringing Global Xpress a step closer to launch in 2013.[20] More recently, it was announced that Telespazio's Fucino Space Center in Italy will also host the first ground station for the Global Xpress network.[21]

Inmarsat respectfully submits the above information to assist the Commission in preparing its forthcoming report to Congress.

Respectfully submitted,

/s/

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18 *See*, Inmarsat News, Inmarsat to invest US $1.2 bn in Ka-band network (Aug. 8, 2010) announcing investment in new satellites and network.

19 *See*, Inmarsat News, iDirect awarded new contract for Global Xpress infrastructure (Feb. 18, 2011).

20 *See*, Satellite Today, Inmarsat-5 Satellites Clear Critical Design Review Ahead of Schedule (Oct. 17, 2011).

21 *See*, Finmeccanica, Press Releases, Finmeccanica wins new orders worth around EUR 112 million through its subsidiary Telespazio (Feb. 16, 2012)(announcing, among other contracts, a new contract with Inmarsat to host the first ground station for Inmarsat's Global Xpress service at the Fucino Space Centre).