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December 6, 2001

Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

Re: ***Notice of Ex Parte Presentation***:
IB Docket No. 01-185

Dear Ms. Salas:

On December 4, 2001, Alan Auckenthaler, General Counsel of Inmarsat Ventures plc, Don Kennedy, Director, International Regulatory Affairs of Inmarsat Ltd., Gary Epstein of Latham and Watkins, and the undersigned, met with Bryan Tramont, Senior Legal Advisor to Commissioner Abernathy. The topics of discussion were those described in the enclosed set of presentation materials and the Inmarsat positions of record in this proceeding.

An original and one copy are enclosed.

Respectfully submitted,

John P. Janka

cc: Bryan Tramont

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PRESENTATION TO

THE FEDERAL COMMUNICATIONS COMMISSION

INMARSAT VENTURES PLC

IB Docket No. 01-185

December 2001

INMARSAT

Overview of Inmarsat

- Privatized in 1999
  - formerly an Intergovernmental Organization (IGO)
- Currently operates nine geostationary MSS spacecraft around the world
- Annual revenues of over $400 Million
- Over 220,000 registered user terminals
- Provides essential mobile satellite services to
  - almost every major commercial airline around the world
  - all cargo ships over 300 GRT, all passenger ships travelling internationally, US Navy and US Coast Guard
  - media organizations, governments, aid organizations, and other commercial businesses

INMARSAT

Inmarsat Services

- Aeronautical services include
  - cockpit communications, aircraft position monitoring, air traffic control
  - weather information
  - voice, data, Internet access, news and video feeds
- Maritime services include
  - distress messaging and safety communications
  - weather information
  - voice, data, Internet access, news and video feeds
- Land-based services include
  - remote news reporting
  - remote operations and monitoring of facilities
  - restoration of failed terrestrial networks (e.g., September 11 rescue)
- Currently supporting US war efforts
  - service to US military
  - live feeds by news organizations

INMARSAT

Inmarsat's Planned New Offerings

- US market access just granted October 2001
  - allows Inmarsat to enter as a new competitor in the US market
    - currently operating through US distributors
  - allows Inmarsat to provide many new services in the US
- Investing $1.72 Billion in next generation Inmarsat-4 network
  - supports high speed services
    - up to 432 kbps MSS (3x the top speed offered today)
  - spacecraft launches start in 2003
  - employs cutting-edge digital technology
  - provides highly efficient spectrum reuse

INMARSAT

FCC's Terrestrial Flexibility Rulemaking

- Ancillary terrestrial uses proposed for
  - L-Band
  - 1.6/2.4 GHz (Big LEO) band
  - 2 GHz band
- Ancillary authorization being considered for
  - Space system licensees
  - Independent terrestrial operators
- Inmarsat's main issue is terrestrial use of the L-Band
  - Also interference from terrestrial users in adjacent 1.6 GHz (Big LEO) band

INMARSAT

Terrestrial Uses at L-Band Create Insurmountable Problems

- Terrestrial uses of the L-band are a fundamentally different use than the MSS uses that Inmarsat has coordinated and designed its satellite network to share with
- Terrestrial uses would interfere with existing and planned Inmarsat services
  - both inside the US and outside the US
- Terrestrial uses would violate existing US international obligations
  - 1996 Mexico City MOU on L-band coordination
  - ITU Table of Frequency Allocations in Radio Regulations
- Terrestrial uses would exacerbate the current shortage of MSS spectrum
  - Motient's self-interference from terrestrial services would increase its spectrum needs beyond what Motient requires for true MSS services

INMARSAT

International Law Problems

- Authorizing terrestrial uses at L-band would violate US obligations under its coordination agreement with the UK, Canada, Mexico and Russia
  - the 1996 Mexico City MOU contemplates solely MSS use of the L-band
  - L-band spectrum that one system no longer needs for MSS is to be made available for the other MSS systems
    - not for a new terrestrial service
    - Motient/TMI clearly do not use all their spectrum assignments under MOU
- The ITU Table of Frequency Allocations does not support proposed terrestrial services in North America
  - the proposed terrestrial services would interfere with MSS uses that conform to the ITU Table

INMARSAT

Terrestrial Interference Problems

- Three main interference problems exist:
  - terrestrial transmitters would cause much more interference into Inmarsat satellites than ever would be generated by satellite terminals
    - "In band" interference into Inmarsat uplink beams serving non-US areas
    - "Out of band " interference into Inmarsat uplink beams serving the US
  - powerful in-band signals from nearby terrestrial base stations would overwhelm Inmarsat mobile receivers
    - Inmarsat receivers are designed to receive much weaker signals from space---22,300 miles away
  - nearby terrestrial base stations also would produce harmful out-of-band emissions that would interfere with Inmarsat receivers
    - filtering out these emissions would waste spectrum that otherwise could be used for MSS

No Feasible Solution for the Terrestrial Interference Threat

- Natural "shielding" in urban areas does not preclude Inmarsat spacecraft from receiving terrestrial interference
- Motient's assertions that "average shielding" will protect Inmarsat are flawed
  - the median shielding value is much lower than asserted
  - in any event, signals from 50% of terrestrial users will be shielded much less
    - and some 30% will not be shielded at all
- Current PCS rules are not designed to manage interference from terrestrial transmitters into satellite receivers
- There is no practical way for Motient to monitor the interference it generates into Inmarsat

INMARSAT

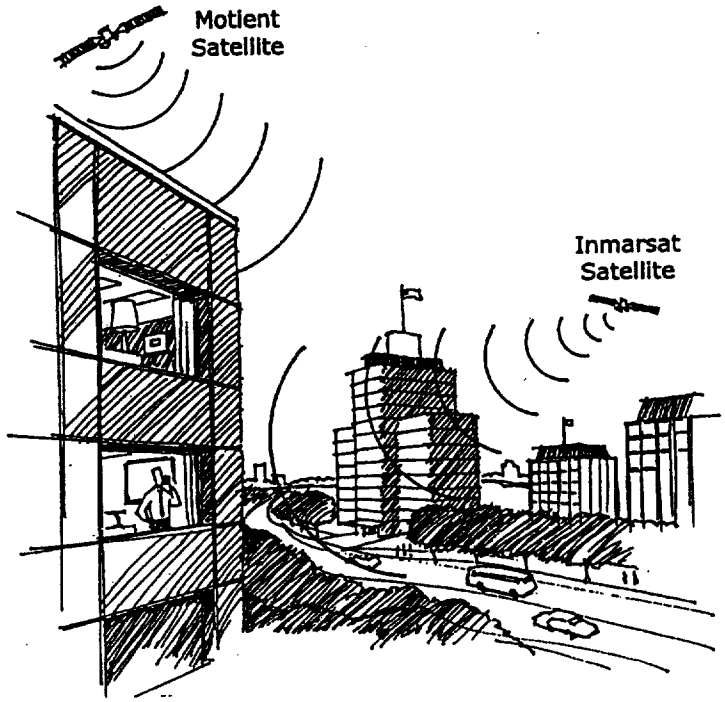
Terrestrial Services Must Be Excluded At L-Band

- Terrestrial interference threatens essential safety and business services provided by Inmarsat
- Inmarsat system not designed to coexist with the terrestrial services proposed in the U.S.
- "Shielding" from buildings, other structures and trees will not solve the interference problem
- Cannot rely on Motient to "measure" the interference that Inmarsat will suffer
- Terrestrial services at L-band are inconsistent with existing US international obligations
- Motient's purported business needs for ubiquitous service can be addressed through commercial means that do not create these issues

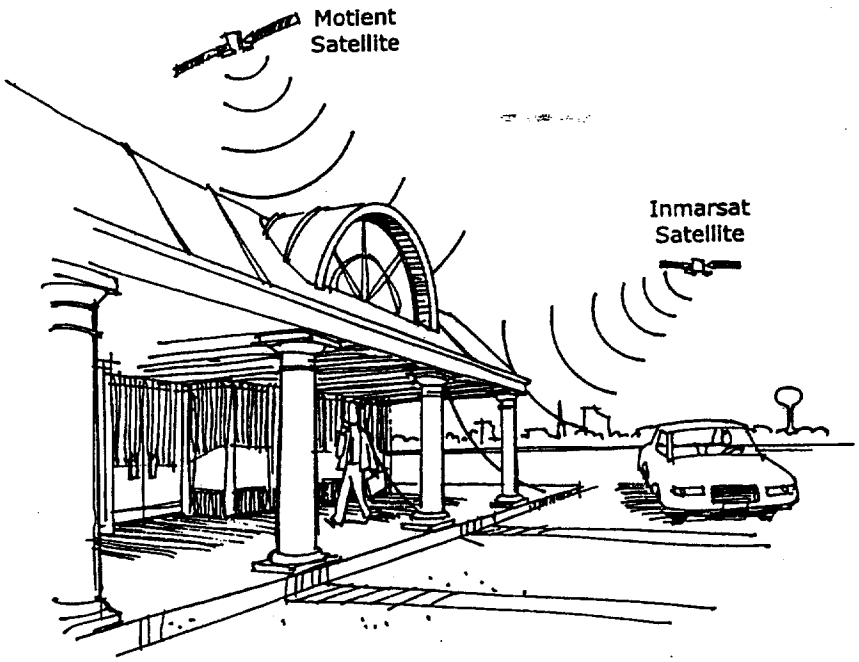
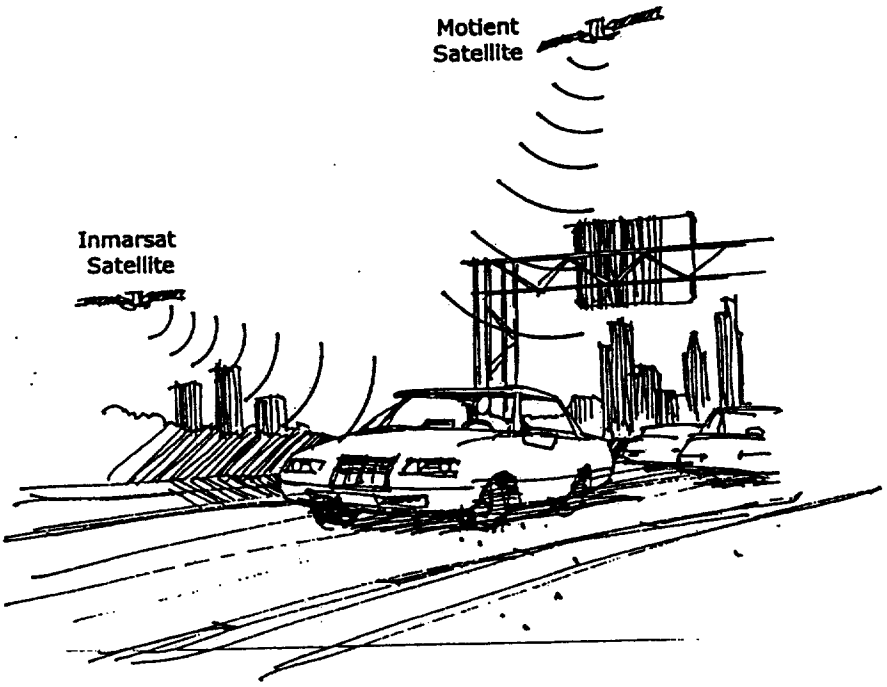
INMARSAT

Figure 1-1. Example Scenarios where the Signal Blockage is Less to the Inmarsat Satellite than to the Motient Satellite

(a) Motient subscriber in office building



(b) Motient subscriber walking outside strip mall



(c) Motient subscriber in automobile