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February 15, 2002

Via Electronic Filing
Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Mobile Satellite Ventures Subsidiary LLC
***Ex Parte* Presentation**
IB Docket No. 01-185

Dear Mr. Caton:

On February 13, 2002, Lon Levin, Vice President and Regulatory Counsel for Mobile Satellite Ventures Subsidiary LLC ("MSV"), along with Bruce Jacobs and David Konczal of Shaw Pittman LLP, counsel to MSV, met with James Ball, Breck Blalock, Howard Griboff, Scott Kotler, David Krech, Paul Locke, Bryan Major, Mark Uretsky, and Marcus Wolf of the International Bureau.

MSV discussed its proposal to deploy an ancillary terrestrial component ("ATC") to supplement its mobile satellite service ("MSS") in the L-band. MSV described the current lack of digital wireless coverage in rural areas and the need for the Commission to ensure that MSS remains viable to ensure service to these areas.

MSV explained that (i) requiring MSS operators to have at least one in-orbit, operational geostationary satellite providing 50-state coverage; (ii) limiting ATC to reuse of frequencies used by the satellite; (iii) requiring the satellite and ATC components to be managed centrally so that spectrum can be dynamically and instantly reassigned as needed for satellite service; and (iv) providing all subscribers with equipment that can communicate with the system's satellites, will ensure that terrestrial service remains ancillary.

MSV explained that its service and equipment are likely to be more expensive than existing terrestrial services and equipment, but much more attractive than the current satellite-only service and equipment, which is very expensive, cumbersome, and offers limited utility in urban areas. Customers of MSV's service will be willing to pay a premium for the rural and remote coverage that can be provided only by a satellite system. By launching its next-generation satellite system, MSV will be providing these users with greatly improved mobile communications service.

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Various self-serving proposals to restrict operations of the system in the guise of preserving ATC's ancillarity would interfere with the efforts of an operator to optimize all components of its system and would diminish the overall system's financial viability and competitiveness, without providing any public benefit, including any increased incentive to maximize the satellite component. This applies to proposed loading requirements, proposed requirements to use the ATC facilities only as repeaters, and to proposed restrictions on pricing and marketing.

The MSS L-band is already congested and, even if MSV is unable to go forward with its next-generation system, it is impossible to imagine how the spectrum could be available for auction, particularly for operation of terrestrial systems that do not provide MSS. It is technically impossible to operate terrestrial facilities that are independent of MSV's satellite system without creating harmful interference to co-channel satellite systems. Terrestrial operations in the L-band can occur only if the satellite and terrestrial operations are integrated under the control of one entity. The need to dynamically reassign spectrum, particularly to provide priority and preemptive access for aeronautical and maritime safety services, further preclude independent terrestrial operations in the MSS L-band.

Please direct any questions regarding this matter to the undersigned.

Very truly yours,

Bruce D. Jacobs OSK

Bruce D. Jacobs

cc: James Ball
Breck Blalock
Howard Griboff
Scott Kotler
David Krech
Paul Locke
Bryan Major
Mark Uretsky
Marcus Wolf