January 28, 2003

Via Electronic Filing and Hand Delivery
Ms. Marlene H. Dortch
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 (Electronic Filing)
File No. SAT-ASG-20010302-00017 et al. (Hand Delivery)

Dear Ms. Dortch:

During the course of this rulemaking, Mobile Satellite Ventures Subsidiary LLC ("MSV") has presented consistent and thorough analyses of the potential for operation of ATC to cause interference to MSV's own operations and those of other satellite systems and services. These analyses were intended to be descriptive of the levels of interference that could be expected given a particular set of parameters; they were not intended to be and should not be taken as prescriptive of the limits for ATC operation. Thus, for example, MSV calculated that operation of ATC would cause no more than a 0.25 dB rise in the noise floor of MSV's own satellite operations (i.e., 6%ΔT/T) and would have a lesser impact on Inmarsat's co-channel operations (approximately 1%ΔT/T). It does not logically follow that because MSV described the operation of a particular deployment of ATC as producing a particular impact that this impact is or should be treated as the threshold for harmful interference.

The determination of the appropriate threshold for harmful interference should be a different exercise, one which considers the standards and norms that already exist and their applicability to this case. Here, the accepted standard for any coordination obligation with respect to satellites is 6% ΔT/T and it is normal for satellite systems to accept substantially greater levels of interference. Moreover, as MSV discussed in an *ex parte* filing submitted January 24, 2003, there is ample evidence that Inmarsat can and does tolerate substantially more than a 6% rise in its noise floor without adverse affect.

MSV urges the Commission to set the appropriate interference thresholds based on sound technical analysis and objective evidence. To do otherwise unjustifiably restricts MSV's ability to provide service.

Very truly yours,

Peter Karabinis pm

Peter D. Karabinis, Ph.D.
Vice President and Chief Technical Officer

Lon Levin pm

Lon C. Levin
Vice President

cc: Chairman Michael Powell
Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Commissioner Jonathan S. Adelstein
Bryan Tramont
Sam Feder
Paul Margie
Jennifer Manner
Barry Ohlson
Bruce Franca
Rick Engelman
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Breck Blalock
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Trey Hanbury
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