



April 16, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: **EX PARTE**
Amendment of the Commission's Space Station Licensing Rules and
Policies
IB Docket No. 02-34

Dear Ms. Dortch:

On April 15, 2003, on behalf of ICO Global Communications (Holdings) Ltd. ("ICO") Larry Williams, Suzanne Hutchings and Cheryl Tritt, counsel to ICO, met with Tom Tycz, Cassandra Thomas, Alexandra Field, Fern Jarmulnek and Steve Spaeth, all of the International Bureau to discuss the above-referenced proceeding.

During the meeting ICO focused its comments on whether the Commission should revise the satellite anti trafficking rules as part of its overall satellite licensing reform efforts. ICO noted that the underlying purpose of the rules, *i.e.*, the prevention of speculative satellite applications and unjust enrichment, could be better achieved through strict milestone enforcement. Strict milestone enforcement discourages speculative applications by requiring licensees to make substantial commitments to construct a satellite system within a relatively short time after licensing. ICO said that it would support reasonable efforts to further enhance milestone commitments and/or to discourage the filing of frivolous applications.

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In accordance with Section 1.1206(b) of the Commission's rules, I am filing an electronic copy of this letter to be included in the docket in the above-referenced proceeding.

Very truly yours,

/s/Suzanne Hutchings
Suzanne Hutchings
ICO Global Communications (Holdings) Ltd.

cc: Tom Tycz
Cassandra Thomas
Alexandra Field
Fern Jarmulnek
Steve Spaeth