



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:

Over the course of April 15-16, 2003,") Larry Williams, on behalf of ICO Global Communications (Holding) Ltd. ("ICO"), had phone conversations with Sam Feder, legal advisor to Commissioner Kevin Martin to discuss the above-reference proceeding.

During the conversations, ICO focused 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: Sam Feder