

Chairman Michael K. Powell
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington DC 20554
United States of America

17 December 2004

Dear Chairman Powell

**POTENTIAL INTERFERENCE TO SATELLITE SERVICES FOR THE
GLOBAL MARITIME DISTRESS AND SAFETY SYSTEM (GMDSS)**

Reference: ATC Rulemaking, IB Docket No. 01-185
Applications of Mobile Satellite Ventures Subsidiary LLC
File No. SAT-MOD-20031118-00333
File No. SAT-AMD-20031118-00332
File No. SES-MOD-20031118-01879

The International Mobile Satellite Organization (IMSO) has been made aware of the decision by the Federal Communications Commission (FCC) of the United States to permit a company called Mobile Satellite Ventures (MSV) to deploy the ancillary terrestrial component (ATC) of their satellite communications services using L-band frequencies within the United States of America. In promulgating this decision, the FCC also announced the relaxation of some limits on the use of ATC which had previously been applied. This issue has been under discussion for several years and we understand that the rules which were finally adopted by the FCC were a compromise between MSV's desire to deploy ATC as widely and quickly as possible, and concerns expressed by Inmarsat about possible interference to GMDSS services.

The specific issue which is currently of concern to IMSO is the announced relaxation of the co-frequency reuse limit from 1725 to 2415. While this may appear to increase the potential interference experienced by the Inmarsat satellites by some 40 percent compared to the level originally prescribed in the ATC rules, we accept that this is a theoretical calculation and there is not yet any empirical evidence to back it up. However, such evidence could only be available following

implementation of ATC by MSV, and it would then be too late to retreat to a safe level if the resulting interference was found to be intolerable. Under normal circumstances this might be an acceptable risk, but GMDSS services are essential for distress and safety communications for mariners at sea and *any* degradation to those services cannot be accepted.

In addition, we understand that MSV is seeking a further relaxation to the ATC limit to a level of almost 30,000 reuses. This would inevitably lead to an increase in interference to the Inmarsat satellites by a factor of 17 times.

IMSO shares the concerns expressed by Inmarsat and others at the relaxation of ATC limits for MSV in this regard and is especially concerned at the potential for interference to essential global distress and safety services if the ATC limits set by FCC are subject to continuing incremental relaxation. IMSO requests the FCC to take these views into account in reaching further decisions on this matter.

A copy of this letter is being sent to Mr Joe Hersey, United States Coastguard, Mr Richard Lamb, United States Department of State and Ms Alison Horrocks, Company Secretary, Inmarsat Group Holdings Limited.

Yours faithfully

Jerzy W. Vonau
Director

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