

ICO – Regulatory Summary

U.S. Letter of Intent Authorization

Orbit location: 91° West Longitude
 Frequency Bands (S band): 2000-2020 MHz uplink
 2180-2200 MHz downlink
 Frequency Bands (feeder links): 29.25-30 GHz uplink
 18.55-18.8 GHz, 19.7-20.2 GHz downlink
 Current spectrum assignment: 2 x 4 MHz (uplink/downlink)

ICO License Milestones

Milestones	Due Date	FCC filing due date	Documents Required
<i>Bond, \$1.5 million</i>	6/24/05	6/24/05	ICO letter, copy of bond
<i>Begin physical construction</i>	7/31/05	8 11/05	ICO letter, certification
Begin coordination	7/17/05	7/27/05	ICO letter/certification
Order TWTAs	9/15/05	9/26/05	ICO letter SSL certification
Complete bus wire harness fabrication	1/15/06	1/25/06	ICO letter SSL certification
Begin comms panel/payload integration	3/01/06	3/13/06	ICO letter SSL certification
Complete propulsion integration	5/01/06	5/11/06	ICO letter SSL certification
Complete bus intcgration	7/01/06	7/11/06	ICO letter SSL certification
Complete coordination, file necessary mods	7/17/06	7/27/06	ICO letter/certification ITU documentation [Mod filing]
Complete main body integration	10/01/06	10/11/06	ICO letter SSL certification
Complete reference performance test	1/01/07	1/11/07	ICO letter SSL certification
Complete thermal vacuum test	3/01/07	3/12/07	ICO letter SSL certification
Launch satellite	7/01/07	7/11/07	ICO letter Launch provider certification
Certify system as operational	7/17/07	7/17/07	ICO letter/certification

Further spectrum assignments in 2 GHz mobile satellite service:

TMI and its affiliate Terrestrial, in a letter filed April 19, 2005, have asked the FCC to redistribute 2 GHz spectrum made available by recent withdrawals and cancellations of 2 GHz licenses held by Iridium, Boeing, and Celsat. Their letter requests an ultimate assignment of 2 x 10 MHz. ICO filed in support of this filing, and also requested assignment of recently reclaimed 2 GHz spectrum, for an ultimate assignment of at least 2 x 10 MHz of spectrum.

Gating Criteria – Prerequisites to Grant of Ancillary Terrestrial Component

(ATC rules may be found at 47 C.F.R. §§ 25.117, 25.143, 25.149, 25.201, 25.252, and 25.255)

MSS operators must provide substantial satellite service to be eligible for ATC authorization

- capability of providing continuous satellite service over the entire geographic area of satellite coverage required in rules (50 states, Virgin Islands, Puerto Rico), if technically feasible
- maintenance of a ground spare satellite, available no later than one year after operations begin, to replace a destroyed or degraded satellite
- commercial availability of service, i.e. offering MSS service to the general public for a fee, throughout the mandatory geographic coverage area

MSS and ATC services must be integrated; applicants must demonstrate:

- all handsets offered are dual-mode (MSS and ATC), or
- provide individualized substantial showings that demonstrate integrated MSS and ATC service

MSS operators may offer ATC only in frequency bands in which they are authorized to provide MSS

ATC Reconsideration Requests

- Clarify that all MSS/ATC handsets must be dual-mode to qualify for our “safe harbor” demonstration of integrated MSS/ATC service – GRANTED
- Forbid ATC-only service subscriptions – GRANTED
- Clarify that gating criteria must be met for each band in which an MSS operator seeks authority to provide ATC – GRANTED
- Clarify that our geographic coverage requirement applies only to the extent technically feasible - GRANTED
- Require MSS/ATC operators to dedicate a certain amount of capacity exclusively for MSS – DENIED

- Require MSS/ATC handsets to always attempt to communicate via the satellite first – DENIED

Additional Rulings

- Affirmed: not in the public interest to grant terrestrial rights to entities other than MSS operators
- Timing of ATC Authorization
 - Boeing request for ‘conditional’ ATC authorization prior to MSS system operation – DENIED
 - Rules already provide for a licensee to receive ATC authority
 - MSS/ATC applicant may seek a pre-authorization ruling that some gating criteria have been met
 - ATC applicants may make a pre-MSS operational showing that geographic and temporal coverage, replacement satellite, and commercial service criteria have been met
 - Such a ruling requires a satisfactory, prospective, substantial showing that its ATC operations will meet integrated service and other gating criteria

Previously Rejected ATC Criteria

- MSS traffic must be quantitatively “primary” or “predominant” in MSS/ATC systems
- All MSS/ATC calls must be routed through a satellite
- MSS operators must demonstrate a technical inability to serve proposed ATC areas by satellite as a condition of ATC
- Additional fees for MSS operators who wish to provide ATC