

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
LIGHTSQUARED SUBSIDIARY, LLC) SAT-MOD-20101118-00239
)
Application for Modification of Its)
Authority for an Ancillary Terrestrial)
Component)

REPLY COMMENTS OF BLUE SKY INFORMATION SERVICES

Blue Sky Information Services (Blue Sky), hereby comments on the Request for Modification of Authority for an Ancillary Terrestrial Component filed on November 18, 2010 by Lightsquared Subsidiary, LLC. Blue Sky provides these comments and viewpoints to support the views of the COMMENTS OF AT&T INC. filed on December 2nd, 2010

Like AT&T, Blue Sky also supports the Federal Communications Commission's goal, as identified in the National Broadband Plan, of identifying 500 Mhz of additional wireless broadband spectrum for commercial purposes. Blue Sky also shares the Commission's belief that rationalizing the Mobile Satellite Services spectrum band for increased terrestrial broadband use should be an important mechanism for achieving this goal. However, Blue Sky urges that any action that the Commission may chose to take on these "Flexibility Matters" should be executed in the context of the currently pending "Notice of Proposed Rule Making" (NPRM) proceedings. Doing so will guarantee "transparency" and appropriate protections of

due process and regulatory fairness amongst all MSS licensees.

Blue Sky also takes this opportunity to inject potentially relevant data points into this proceeding which became available after the closing of the formal “Initial Comments” period on December 2nd, 2010. On December 3rd, 2010, web site

SPACENEWS.COM reported¹ that El Segundo, California - based Boeing Satellite Systems issued the following statement regarding the SkyTerra 1 satellite.

“The SkyTerra 1 satellite launched November 14, is stable and healthy, and we are proceeding with post-launch checkout processing. As of December 2, the L-Band antenna reflector HAS NOT been fully deployed. Boeing, in close partnership with its LightSquared customer, has assembled a team of experts to assess progress and continue deployment of the antenna. As with an post-launch checkout, it’s not unexpected for minor delays to occur, and we are proceeding to complete in-orbit testing and hand over the satellite and it’s Space Based Network to Lightsquared in early 2011.”

Blue Sky includes this updated information as the SkyTerra 1 satellites operational and overall functionality plays a vital role in this Modification Request, as it pertains to the requisite ATC Gating Requirements.

The complete context of the SpaceNews.Com article is provided on the following page.

¹http://www.spacenews.com/satellite_telecom/101203-boeing-antenna-glitch-skyterra.html

Fri, 3 December, 2010

Boeing Space Wrestling with Antenna Glitch on SkyTerra 1

PARIS — The SkyTerra 1 mobile communications satellite launched Nov. 14 for startup wireless broadband provider LightSquared has been unable to fully deploy its large reflector antenna, which is the key enabler for the company's planned U.S. broadband network, industry officials said.

These officials said satellite prime contractor Boeing Space and Intelligence Systems, assisted by antenna builder Harris Corp., has assembled a team to analyze what has happened and to determine whether the antenna unit can be manipulated in some way to permit full deployment.

Officials said that as of Dec. 2, ground teams remained hopeful that the antenna, which when deployed measures 22 meters in diameter and is the largest commercial reflector of its kind ever launched, might be gently "shaken" by ground commands to solve the problem.

"The situation does not look good but it's too early to say whether it's a major issue or something that will be forgotten in a few months," said one industry official. "It's understandable that the satellite control team would want to take its time before deciding on corrective action."

Boeing began deployment of the antenna Nov. 30. A glitch-free unfurling would have taken no more than several hours.

In response to Space News inquiries, El Segundo, Calif.-based Boeing on Dec. 2 issued the following statement: "The SkyTerra 1 satellite, launched Nov. 14, is stable and healthy, and we are proceeding with post-launch checkout processing. As of Dec. 2, the L-band antenna reflector on the SkyTerra 1 satellite has not been fully deployed. Boeing, in close partnership with its LightSquared customer, has assembled a team of experts to assess progress and continue deployment of the antenna. As with any post-launch checkout, it's not unexpected for minor delays to occur, and we are proceeding to complete in-orbit testing and hand over the satellite and its Space Based Network to LightSquared in early 2011."

Reston, Va.-based LightSquared, owned by hedge fund Harbinger Capital Partners of New York, is preparing to use spectrum it has secured for satellite communications to deploy a network of ground-based signal boosters to provide wireless broadband throughout the United States.

The ground-based repeater network, known as an Ancillary Terrestrial Component (ATC), will serve most customers in most places, with the satellite used only when the customer is beyond terrestrial network coverage. But LightSquared's license to use its L-band radio spectrum is conditioned on its maintaining a mobile satellite service.

How tightly the U.S. Federal Communications Commission (FCC) will bind ATC approval to a functioning satellite service is still unclear as the U.S. regulator is still working on a final set of rules that would apply to all mobile satellite ventures planning ATC networks.

SkyTerra 1, which was launched aboard an International Launch Services Proton Breeze M rocket from Russia's Baikonur Cosmodrome in Kazakhstan, is scheduled to enter service in early 2011.

LightSquared will need to deploy thousands of ATC towers to provide nationwide coverage, a multibillion-dollar undertaking that still lacks full financing. Harbinger has supported the company up to now, but has been unable to secure strategic partners or others willing to make major investments of their own.

SkyTerra 1 is insured for about \$268 million, a policy for which LightSquared paid a \$37.5 million premium. A second, identical satellite, SkyTerra 2, is nearly completed at Boeing and presumably could be launched within a year if needed. It remains to be seen whether insurance underwriters would agree to maintain the company's 14 percent premium rate or would insist on a sharply higher rate in the event that SkyTerra 1's antenna fails to fully deploy.

Alternatively, insurers could insist on rewriting the existing policy to exclude the SkyTerra 2 antenna from coverage. The second satellite is also insured for \$268 million.

Melbourne, Fla.-based Harris has become the dominant supplier of the latest generation of large reflector antennas used to provide mobile communications to small devices such as car radios and smartphones. Increasing the satellite antenna size and power means user handsets do not need to generate as much power on their own to capture and maintain a communications link.

The size of these antennas, which unfurl like umbrellas, has increased steadily over the past decade, from 5 to 9, 12, 18 and now, with SkyTerra, 22 meters.

Harris' selling point has been the fact that the antennas, when in stowed position for the satellite's launch, take up a remarkably small amount of volume and weight given their deployed dimensions.

Typically the antenna is deployed using an articulated boom that locks into position, putting the antenna some distance from the body of the satellite. The antenna itself is then slowly deployed. Videos of the maneuver taken during ground tests suggest a large spider stretching its legs.

While the technology, developed for U.S. government programs, is considered proven enough to give comfort to insurance underwriters, its commercial adoption has not come without setbacks. The Garuda 1 satellite launched in 2000 with a 12-meter-

diameter antenna was found to have a defect that prevented its owner, Asia Cellular Satellite (ACeS) of Indonesia, from making full use of it.

The 12-meter S-band antenna on the Eutelsat W2A satellite launched in April 2009 and owned by Solaris Mobile of Ireland, a joint venture of Eutelsat of Paris and SES of Luxembourg, suffers from an anomaly that will not permit Solaris to deliver all the services it had planned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Richard Foley', with a stylized, cursive script.

Richard Foley
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December 5, 2010

CERTIFICATE OF SERVICE

I, Richard Foley, certify that on this 6th day of December, 2010, a copy of the foregoing Reply Comment was sent via Federal Express to the following person(s). (unless another delivery method is specified):

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*Denotes service via email.

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