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1501 K STREET, N.W.
WASHINGTON, D.C. 20005
TELEPHONE 202 736 8000
FACSIMILE 202 736 8711
www.sidley.com
FOUNDED 1866

BEIJING
HONG KONG
LONDON
SHANGHAI
SINGAPORE
TOKYO

WRITER'S DIRECT NUMBER
(202) 736-8119

WRITER'S E-MAIL ADDRESS
tvanwazer@sidley.com

November 15, 2001

VIA HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Re: Iridium U.S., L.P. Applications for Assignment of Licenses
Lead File No. SAT-ASG-20010319-00025
Section 1.65 Amendment

Dear Ms. Salas:

Iridium Satellite LLC ("Iridium Satellite") and Iridium Carrier Services LLC ("Iridium Carrier") (collectively with their subsidiaries and parent companies, "New Iridium"), hereby submit the following Section 1.65 amendment to the above-referenced applications.

As noted in New Iridium's original applications, New Iridium's two parent companies – Iridium Holdings LLC and Iridium Carrier Holdings LLC – have continued to issue Class B (non-voting) units to facilitate acquisitions of assets and licenses used in the operation of the IRIDIUM System. *See Exhibit B at 7-8.* On October 5, 2001, New Iridium issued Class B units representing a 1.1 percent ownership interest in both Iridium Carrier Holdings and Iridium Holdings to VR Telecommunications GmbH & Co. ("VRT"). VRT owned 66 percent of the company that owns the IRIDIUM System's Italian gateway and one of its affiliates held licenses to operate the IRIDIUM System in various countries. Under the five-factor home market test, VRT is a German Company:

- (a) Place of Incorporation: Germany
- (b) Nationality of Investment Principals, Officer and Directors: All German citizens
- (c) Location of World Headquarters: Düsseldorf, Germany

Ms. Magalie Roman Salas
November 15, 2001
Page 2

(d) Location of Majority of Tangible Property: Norderfriedrichskoog, Germany

(e) Country of Greatest Sales Revenue: Germany

VRT does not own any direct or indirect interest of 10 percent or more in any firm that provides telecommunications service in, to, or from the United States.

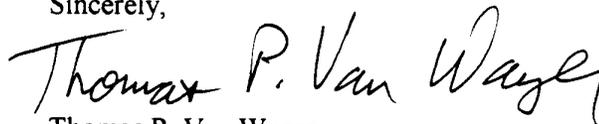
VRT is ultimately owned by six German companies. All six companies have their headquarters, assets and earn the majority of sales revenue in Germany. All the officers and directors of the six companies are German. None of the six companies has any non-WTO investors. The six companies are:

1. VRT Telecommunications Geschaefstsfuehrungs-GmbH (located in Norderfriedrichskoog, Germany)
2. VR Telecommunications Holding GmbH (located in Düesseldorf, Germany)
3. E.ON Telecom GmbH (located in Düesseldorf, Germany)
4. E.ON Energie AG (located in Munich, Germany)
5. RWE Telliance Telekommunikation GmbH & Co. KG (located in Essen, Germany)
6. Viterra AG (located in Essen, Germany)

New Iridium expected to submit this information with its response to the FCC's letter of October 11, 2001 requesting additional information. Unfortunately, New Iridium has encountered various delays in responding to the October 11, 2001 letter.

Please direct any questions regarding this material to the undersigned.

Sincerely,



Thomas P. Van Wazer

Attachment

cc: Philip Malet, Steptoe & Johnson
William D. Wallace, Crowell & Moring LLP
James G. Lovelace, Federal Bureau of Investigation
Richard P. Salgado, U.S. Department of Justice

CERTIFICATION TO SECTION 1.65 AMENDMENT

I, Michael Deutschman, under penalty of perjury, do hereby certify that the information contained in the attached Section 1.65 Amendment to the Applications for Assignment of Licenses, Lead File No. SAT-ASG-20010319-00025, by assignor Iridium U.S. LP, and its affiliates, and assignee Iridium Satellite LLC, and its affiliates, is true and correct to the best of my knowledge, information, and belief.



Michael Deutschman
Chief Administrative Officer
Iridium Carrier Services LLC, and
Iridium Satellite LLC

Dated: November 15, 2001