



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

November 2, 2012

Via E-mail

Mr. Matthew J. Desch  
Director and Chief Executive Officer  
Iridium Communications Inc.  
1750 Tysons Boulevard, Suite 1400  
McLean, Virginia 22102

**Re: Iridium Communications Inc.  
Schedule TO-I  
Filed on October 2, 2012  
File No. 005-83853**

Dear Mr. Desch:

We have reviewed your filing and have the following comment.

General

1. In your Form 8-K filed on November 1, 2012, you disclose that the financial statements incorporated by reference into your Schedule TO and disseminated to security holders in summary form should no longer be relied upon. Please amend your schedule to include this information. Please also tell us what consideration you have given to disseminating corresponding disclosure to security holders (including the effect of your estimated adjustments on all disclosure required by Item 1010(a) of Regulation M-A) and extending your tender offer so that at least five business days remain in the offer following dissemination. We remind you that you are responsible for determining whether the offering document and schedule contain any untrue statements of material fact or omit information necessary to make the information contained therein not misleading.

You may contact me at (202) 551-3503 if you have any questions.

Sincerely,

/s/ David L. Orlic

David L. Orlic  
Special Counsel  
Office of Mergers and Acquisitions

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cc: Via E-mail  
Brian F. Leaf, Esq.  
Cooley LLP