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McDermott, Will & Emery 1850 K Street, N.W. Suite 500 Washington, D.C. 20006

FACSIMILE TRANSMITTAL FORM

OUR FACSIMILE NUMBER IS: 202-778-8087 OUR CONFIRMATION NUMBER IS: 202-778-8090
DATE: 6/12/96 NO. OF PAGES (INCLUDING COVER SHEET): 4
TO: Doug Young
COMPANY: FCC CLIENT NUMBER: 44058-010
FACSIMILE NUMBER: (202) 418-1918
SENDING PARTY: Wendy M. Creeden DIRECT PHONE: 202-778-8293
TIMEREEPER ID: 3102
CONFIRMATION REQUIRED: YESNO _X
IF YES, CONFIRMATION TELEPHONE NUMBER:
COMMENTS: Doug Per our discussion, attached is a copy of GeoPhone's granted STA. Please call if you have any questions or need any additional information. Thanks. Wendy
PLEASE NOTE:
This facsimile originates from the Washington office of McDermott, Will & Emery. If there are any problems regarding the reception of the number of pages listed above, please call our facsimile center at the following number: 202-778-8090 (M-F 8:00 a.m. to 8:00 p.m.), or the sending party at the above listed number.
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FAX OPERATOR: TIME SENT:
TIME CONFIRMED: BY:
AFTER SENDING RETURN THIS FAX TO:



GEOPHONE COMPANY, LLC. 180 Admiral Cochrane Dr. Suite 370 Annapolis, MD 21401 USA Phone: 410-571-9090 FAX: 410-571-0022 E-mail: mktg@geophone.com

12 April, 1996

Federal Communications Commission Satellite and Radiocommunications Division Post Office Box 358160 Pittsburgh, Pennsylvania 15251-5160

REF: GeoPhone Company, L.L.C.

Received

Rediocommunications Division

international Bureau

Granted

100 4-55A-EXT-96 - Exp. 10/14/96

authorized by:

REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

Dear Sir or Madam:

Pursuant to Section 25.119 of the Federal Communications Commission's (FCC) Rules and Regulations, GeoPhone Company, L.L.C. (GeoPhone) hereby requests an extension of Special Temporary Authority (STA) for a period of 180 days beginning on the 28th day of April, 1996. GeoPhone is presently operating under an STA (File Number 1765-SSA-P/L-95) which was granted effective 25 October, 1995 and expires on the 27th day of April, 1996. GeoPhone requires an STA extension so that it can continue its testing of up to twelve (12) transportable. Very Small Aperture (VSAT) earth stations. Included in this request are one FCC Form 159 and a check for \$ 125.00 to cover the requisite filing fee.

The Commission should be aware that the STA was originally filed by GcoPhone Corporation, but during the time between filing and the time the STA was approved by the Commission. GeoPhone was converted from a Delaware "C" corporation (GeoPhone Corporation) to a Delaware Limited Liability Company (GeoPhone Company, L.L.C.) with effective date of 19 September, 1995. This change was documented on form FCC 430 which was submitted by GeoPhone Company, L.L.C. in support of the STA application on 28 September, 1995.

By way of background. GeoPhone seeks to establish a VSAT network that would provide lowcost telephony, fax and data services to rural areas in developing countries where current communications infrastructures do not exist. GeoPhone also believes that this new technology can also be used for certain types of specialized low-data-rate data networks in the United States with increased and more efficient use of available spectrum than with the existing alternative technologies. Individual terminal price, as well as the cost of the network as a whole, are critical to the success of GeoPhone's product in these markets. GeoPhone is currently addressing the



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cost issue by examining unique implementations which would simplify terminal hardware and network architecture. These implementations rely on the use of modern digital signal processing techniques, as well as spread spectrum transmission and modulation techniques with a new type of proprietary spread spectrum code-assigned-multiple-access call setup/teardown system that has been pioneered by GeoPhone. Accordingly, GeoPhone is seeking authorization from the Commission to continue the testing of the capabilities of these new implementations, which include the following: new low-rate vocoder, new signal processing algorithms, a new type of spread spectrum modem, and a unique microwave and RF hardware architecture employing advanced monolithic circuits. GeoPhone expects the testing of these implementations to be completed within the next two years. No services will be provided to the general public as part of these test programs.

At this time, GeoPhone understands that the appropriate authorization from the Commission for the testing of its new implementations should be an experimental license. However, prior to this understanding, on 31 July, 1995, GeoPhone filed with the Commission an application for developmental license to conduct its testing by operating two transportable VSAT earth stations in the vicinity of Woburn, Massachusetts. A copy of this application is enclosed for your review. Upon recommendation from the Commission, on 28 September, 1995, GeoPhone requested an STA to operate the VSAT satellites and asked that the STA supersede its previous developmental license applications. For your convenience, a copy of GeoPhone's granted STA request is enclosed.

GeoPhone plans to prepare and file in the near future an application for an experimental authorization to operate up to twelve transportable VSAT earth stations at various GeoPhone test locations in an approximate 70 mile radius of Annapolis, Maryland. GeoPhone is requesting an extension of the STA granted on 25 October, 1995 to continue operation of the VSAT earth stations during the processing of its experimental license application. GeoPhone seeks authorization for the Commission to operate under the same technical parameters as granted in the previous STA, with the exception of using up to twelve (12) rather than two (2) VSAT terminals during testing, and that the GeoPhone RF terminal hardware currently being developed, which has the same or better performance and specifications than the previously used commercial RF hardware will be used for most of this developmental testing. This new hardware will be submitted for Type Certification once developmental testing has been completed. In addition, as noted above, the testing of the equipment will be performed in and around Annapolis, Maryland, not Woburn, Massachusetts. The technical parameters are detailed in the enclosed developmental application and STA request.



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GeoPhone respectfully asks that the Commission look favorably on this STA extension request. In the event the Commission requires additional information in connection with this matter, please direct all communications to the attention of Kris Anne Monteith at Mc Dermott, Will and Emery, 1850 K Street, N. W., Suite 500, Washington, D. C. 20006-8087. The telephone number for Ms. Monteith is (202) 778-8241.

Sincerely,

Dr. Apostle G. Cardiasmenos

President

Enclosures