

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

_____)
In the Matter of)
)
Motorola Satellite Communications, Inc.) File No. _____)
)
Application for Special Temporary)
Authority to Conduct Experimental)
Tests in the 471 MHz, 5854-5896 MHz,)
3650-3700 MHz, 824-850 MHz, and)
869-894 MHz Bands)
_____)

EXPEDITED CONSIDERATION REQUESTED

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Pursuant to Section 309(f) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(f), Motorola Satellite Communications, Inc. ("Motorola") hereby requests Special Temporary Authority ("STA") to conduct experimental tests in and around Page, Arizona, for a period not to exceed 180 days, in the 471 MHz, 5854-5896 MHz, 3650-3700 MHz, 824-850 MHz, and 869-894 MHz frequency bands.

Today, Motorola is also filing an application (FCC Form 442) for experimental authority to conduct the subject tests. However, due to the substantial financial investment and a tight schedule to accommodate a series of demonstrations for a number of foreign travelers, Motorola seeks an STA so testing may begin no later than **July 23, 1999**.

I. PROPOSED TESTING

The purpose of the proposed testing is to test and develop radio equipment for export. These radio products will be tested using an aircraft platform based in Page, Arizona. The aircraft will fly within a radius of 45 kilometers of Page and will operate at altitudes between 15,000 and 30,000 feet, with most of the testing conducted at approximately 18,000 feet.

In particular, this application requests Special Temporary Authority to test over communications links that include (1) a bi-directional aircraft telemetry link at 471 MHz, (2) a forward link in the 5854-5896 MHz band from a fixed ground station to the aircraft and then to a mobile user in the 824-850 MHz band, and (3) a return link in the 869-894 MHz band from a mobile user to the aircraft and then to the fixed ground station in the 3650-3700 MHz band.

II. GRANT OF MOTOROLA'S REQUEST FOR SPECIAL TEMPORARY AUTHORITY WILL NOT CAUSE ANY HARMFUL INTERFERENCE TO EXISTING USERS AND WILL SERVE THE PUBLIC INTEREST

The Commission has a long-standing policy of granting Special Temporary Authority where such authorization will not cause harmful interference and will serve the public interest, convenience and necessity. *See, e.g., In the Matter of the Applications of Newcomb Communications, Inc.*, Order and Authorization, 8 FCC Rcd. 3631, 3633 (1993); *In the Matter of Columbia Communications Corporation*, Order, 11 FCC Rcd. 8639, 8640 (1996); *In the Matter of American Telephone & Telegraph Company*, Order, 8 FCC Rcd. 8742 (1993). Motorola has demonstrated in its application for experimental authorization and the technical reports attached

thereto that the proposed testing will not cause harmful interference to any authorized spectrum users operating in the bands for which authorization is sought.¹ See Attachment A.

Moreover, the existing Cellular Radiotelephone Service licensees will at all times maintain complete control over use of their licensed spectrum during the times that the proposed experiments will be conducted. Motorola will operate on the cellular frequencies in full compliance with all applicable Commission Rules and will transmit only to its own community of private users. Current cellular operations and service to existing subscribers and roamers will not be affected. Should any harmful interference occur, Motorola is prepared to immediately cease operation on the subject frequency.

Grant of the instant STA will serve the public interest because the new technologies Motorola will develop are intended to bring the benefits of modern communications to locations in the world that currently have only sporadic telecommunications availability. Moreover, Motorola will be able to market telecommunications products to new overseas licensees and cellular operators who must construct infrastructure to fulfill their license obligations. This, in turn, will bolster U.S. telecommunications equipment exports.

Thus, early market entry is not only paramount to Motorola's success in this highly competitive line of business, but it is also in the public interest.

¹ Use of the 800 MHz bands will be coordinated with the licensed cellular carriers in the region so as to ensure that there will be no harmful interference to their customers.

III. EXPEDITED ACTION REQUESTED

Substantial time, money and planning have been invested into designing, developing and marketing Motorola's new technologies. Also, Motorola has made a variety of major commitments to representatives of major potential purchasers with regard to the timing associated with equipment availability. Potential customers are scheduled to arrive in Arizona in early September for demonstrations of these new technologies. Successful testing in Page is necessary before the systems can be sold to foreign customers, most of whom are in the Southern Hemisphere. These customers have a limited amount of time during which to evaluate and install new systems before the onset of inclement weather.²

Motorola needs 4-6 weeks to perform its testing before the arrival of the first overseas testing teams. In preparation for their arrival, Motorola has made extensive hotel and transportation arrangements, and has prepared detailed itineraries to facilitate participation in the demonstrations. Moreover, Motorola has expended considerable effort and expense for use of test aircraft, hangar rental, ground equipment installations and rental of wireline communication links for these demonstrations and tests.

In this exceptionally competitive international equipment environment, Motorola must act expeditiously to assure successful product testing, demonstration and marketing. Thus, Motorola requests expedited Special Temporary Authorization by no later than Thursday, July 22, 1999, because it needs to begin testing by no later than Friday, July 23, 1999

² The lead-time required for installation of systems in certain locations of South America, for example, requires commencement in suitable weather conditions, which begin in late September.

IV. SECTION 304 WAIVER

In accordance with Section 304 of the Communications Act of 1934, 47 U.S.C. § 304, Motorola hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum because of the previous use of the same, whether by license or otherwise.

V. CONCLUSION

For the foregoing reasons, Motorola requests Special Temporary Authority to conduct experimental tests in Page, Arizona, for a period not to exceed 180 days, over the following frequencies: 471 MHz, 5854-5896 MHz, 824-850 MHz, 869-894 MHz and 3650-3700 MHz. Motorola respectfully requests Commission action no later than July 22, 1999.

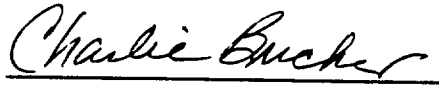
ANTI-DRUG ABUSE CERTIFICATION

Pursuant to Section 1.2002 of the Commission's Rules, 47 C.F.R. § 1.2002 (1997), Applicant certifies that neither Applicant nor any of their shareholders, nor any of their officers or directors, nor any party to this Application are subject to a denial of Federal benefits pursuant to authority granted in Section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

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Dated: *July 6, 1999*

Respectfully submitted,

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July 6, 1999