

TERMINAL

0100-EX-ST-1999

[STA LICENSE LETTER APPLICATION]

_____, 1999

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

ATTN: Frank Wright,
Office of Engineering and Technology

Re: Request for Special Temporary Authority
for Radio Station License

Dear Mr. Caton:

COMSAT Mobile (Name of the applicant) herein requests
a grant of special temporary authority for a new mobile radio
station license beginning _____ and extending until
_____ to operate _____ (number of units) land-based
INMARSAT ship earth station(s) from temporary-fixed locations in
the United States. In support of this request, _____
(Name of the applicant) submits the following information:

1. Applicant's Name and Address:
COMSAT Mobile Communications
6560 Rock Spring Drive
Bethesda, MD 20817
2. Name and Address of the Person for inquiries regarding this
request: Lilanie Geiger
6560 Rock Spring Dr.
Bethesda, MD 20817
3. Particulars of Operation:

Frequency	Power	Modulating Signal	Necessary Bandwidth
1626.5 - 1646.5 MHz	14 dBw	600 BPS	2 KHz

4. Geographical location of the proposed operation:
Various locations and
6560 Rock Spring Drive, Bethesda, MD 20817
5. Antenna Type: Directional _____ Non-Directional X
Width of beam in degrees at the half-power point: _____
Orientation: Horizontal plane _____ Vertical plane _____
6. Transmitting equipment to be installed:
- | Manufacturer | Type | Number |
|----------------|---|----------|
| <u>Trimble</u> | <u>Galaxy Sentinel</u>
<u>TNA 8001</u> | <u>3</u> |

COMSAT Mobile Communications (Name of the applicant) a U.S. corporation organized under the laws of the state of Maryland, affirmatively states that it does not in any manner act as a representative of a foreign government or a subdivision thereof nor would the authorization sought herein be used for the exclusive purpose of developing radio equipment for export that would come under the jurisdiction of a foreign government. The applicant has never had any FCC station license revoked or any application for permit, license, or renewal ever denied by the Commission.

COMSAT Mobile Communications (Name of the applicant) further states that grant of this request would not have a significant environmental impact and, thus, does not require an Environmental Statement under Section 1.1307 of the Commission's Rules. Unless otherwise indicated in an attachment to this request, the authorization sought herein will not be sought for fulfilling the requirements of a government contract with an agency of the United States Government.

In addition, COMSAT Mobile Communications (Name of the applicant) further certifies that neither the applicant, nor any other party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a.

This temporary license is sought by COMSAT Mobile Communications (Name of the applicant), a satellite communic (type of business), to operate 3 (number of units) INMARSAT-C (terminal type) terminal(s) from temporary-fixed locations in the United States to provide test and demonstration (type of service) services. Simultaneous to this request, COMSAT has submitted to the Common Carrier Bureau a request for special temporary authority to provide satellite communications services to the subject terminal(s) via

the INMARSAT system for the purposes stated herein.

Accordingly, COMSAT Mobile Communications (Name of the applicant) respectfully submits that the public interest would be served by the operation of the subject terminal for the aforementioned purposes and, thus, requests that the Commission grant the instant request for temporary authority.

The requisite filing fee of \$45 is enclosed.

Respectfully submitted

D. Geiger
(Title) Manager Service Development
(Telephone number) 1-301-214-3432

cc: Sylvia Lam
Carl Huie

REQUEST FOR SPACE SEGMENT CAPACITY TO OPERATE INMARSAT TERMINALS FROM LAND-BASED LOCATIONS IN THE UNITED STATES

The Federal Communications Commission ("FCC") requires COMSAT Corporation ("COMSAT") to obtain authority prior to providing service to Inmarsat terminals operated from land-based (i.e., nonmaritime locations) within the United States. The FCC will only grant domestic service authority to COMSAT under certain circumstances. The FCC's determination is made on a case-by-case basis with regard to the specific facts of each request. For instance, the FCC has authorized COMSAT to provide space segment capacity in the United States where:

- (1) the capacity is required to test and demonstrate the communications capabilities of an Inmarsat terminal to prospective customers;
- (2) the performance of an Inmarsat terminal is to be tested prior to sending/taking it abroad;
- (3) personnel are to be trained in the use of Inmarsat terminal(s) prior to being deployed abroad;
- (4) an Inmarsat terminal is needed for emergency communications (either as backup communications or disaster relief); or
- (5) an Inmarsat terminal is required to provide services from a remote location where no alternative means of communications is available.

Therefore, the following information is necessary for COMSAT to prepare its request for authority from the FCC to provide domestic Inmarsat space segment capacity to your terminal(s) in a timely manner. The more specific and detailed the information you provide us about the intended use(s) of the terminal, the more likely it will be that COMSAT will be able to obtain timely FCC authorization to provide the services you need! Please feel free to attach additional pages if needed to answer questions fully.

1. Company's Name: COMSAT Mobile Communications
 2. Company's Business: Inmarsat Service Provider
-

3. Who will operate the terminal? COMSAT Mobile Comm.

4. By what date do you need to operate the terminal in the U.S.? ASAP
For how long? 24 months

Please indicate on page 3 your reasons for needing to use the terminal by the specified date.

5. Will the same terminal also be used in one or more foreign countries or globally?
Yes ☒ No ☐.

IF YES, please state on page 3 the country or countries involved, and how frequently you intend to use the terminal outside of the U.S.

South America: Countries unknown at this time

Asia: Hong Kong

Europe: Belgium and Africa

6. Will the terminal be used for test and/or demonstration purposes?
Yes ☒ No ☐.

IF YES, please indicate on page 3 where the test(s) or demonstration(s) will take place, their duration and whether (a) this is a test prior to sale, (b) this is a test after sale prior to use, (c) this is a demonstration to potential customers, (d) the terminal will be a part of a test or demo pool, or (e) other (please describe).

7. Will the terminal be used to train your employees, customers, or other users?
Yes ☒ No ☐.

IF YES, please explain on page 3 the nature, purpose, and duration of the training (indicating in particular whether the terminal will be used outside the U.S. or if personnel being trained will be deployed outside the U.S.):

8. Will the terminal be used for emergency communications or in a remote location where no alternative means of communications exist? Yes ☐ No ☒.

IF YES, please describe on page 3 the nature of the emergency communication (if applicable), state the location, describe the communications service desired, and explain the reason(s) why existing means of communications, in particular those of the U.S. domestic mobile satellite service licensee (AMSC), are not available or are inadequate to meet your communications requirements:

9. If the terminal is to be used for high speed data applications, please indicate the speed at which transmissions will be conducted: N/A

10. Does your use of the Inmarsat terminal relate to a U.S. Government contract?

Yes _____ No x _____.

IF YES, please briefly describe below how the terminal will be used in fulfilling the government contract:

11. If not otherwise provided above, state the purpose for which the terminal will be used in the United States: Test and demonstration.

12. You are required to obtain a separate FCC license before operating the terminal in the United States. Have you applied to the FCC for a license to operate the terminal?

Yes X No .

IF YES, give the date you filed the license application: _____; or the grant date: _____. Please attach a copy of the terminal license application.

IF NO, please complete the enclosed FCC application form and return it with the other commissioning materials, or explain on page 3 why no additional FCC license is required.

Use the space below to provide any additional requested information:

[illegible]

Thank you for your assistance in providing us the above information.

APPLICATION FOR NEW OR MODIFIED RADIO STATION AUTHORIZATION UNDER PART 5
OF FCC RULES - EXPERIMENTAL RADIO SERVICE (OTHER THAN BROADCAST)

Applicant's Name and Post Office address (Street address, city, state, and ZIP Code. See instruction No. 4) COMSAT Mobile Communications 6560 Rock Spring Drive Bethesda, MD 20817	DO NOT WRITE IN THIS BLOCK File No.
--	--

2(a). Application for (check only one box)

☒ New station ☐ Modification of existing authorization

2(b). For Modification indicate below:

File No: Call Sign:

3. Application for Modification: Check the box beside all particulars to be modified. Check either addition or replacement to indicate whether the change is an addition or a replacement of parameters in the current authorization.

☐ FREQUENCY - ☐ EMISSION - ☐ POWER - ☐ LOCATION -
☐ addition or ☐ replacement? ☐ addition or ☐ replacement? ☐ addition or ☐ replacement? ☐ addition or ☐ replacement?

☐ OTHER PARTICULARS - addition or replacement? (Describe below or in attached EXHIBIT No. _____)

4. Particulars of Operation (see instruction below)

Frequency (State whether kHz or MHz) (A)	POWER			EMISSION (E)	MODULATING SIGNAL (F)	NECESSARY BANDWIDTH (kHz) (G)
	(B)	(C)	(D)			
1626.5		14DBW	Mean	BPS	600 BPS	
1646.5						
MHz						

- (A) List each frequency or frequency band separately. (If more space is required, attach as EXHIBIT No. _____)
(E) Insert maximum RF output power at the transmitter terminals. Specify units.
(C) Insert maximum effective radiated power from the antenna (if pulsed emission, specify peak power). Specify units.

(D) Insert "MEAN" or "PEAK" (See definitions in Part 5).

(E) List each type of emission separately for each frequency. (See Section 2201 of FCC Rules)

(F) Insert as appropriate for the type of modulation:

- (1) the maximum speed of keying in bauds;
- (2) maximum audio modulating frequency;
- (3) frequency deviation of carrier;
- (4) pulse duration and repetition rate.

For complex emissions, describe in detail in the space provided below.

(G) Describe how the necessary bandwidth was determined in space provided below.

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5(a). Proposed location of transmitter and transmitting antenna (check only one box to indicate type of operation):
☐ FIXED/BASE ☐ MOBILE ☒ BASE AND MOBILE

5(b). If permanently located at a FIXED location, give below:

State MD County Montgomery City or Town Bethesda
Number and street (or other indication of location)

6560 Rock Spring Drive

5(c)(1). Enter geographical coordinates exact to the nearest second (see instruction 10)

North Latitude (DD-MM-SS)

39° 13' 20" 3

West Longitude (DD-MM-SS)

077° 16' 60" 6

5(c). If mobile, describe the exact area of operation

5(c)(1) Enter geographical coordinates of the approximate center of mobile operation (see instruction 10)

North Latitude

0

West Longitude

0

5(d). Datum (see instruction 10):

☐ NAD 27

☒ NAD 83

(GPS)

6. Is a directional antenna (other than radar) used? ☐ YES ☒ NO

If "YES", give the following information:

(a) Width of beam in degrees at the half-power point

(b) Orientation in horizontal plane

(c) Orientation in vertical plane

7. Is this authorization to be used for fulfilling the requirement of a government contract with an agency of the United States Government? ☐ YES ☒ NO

If "YES", attach as EXHIBIT No. _____ a narrative statement describing the government project, agency and contact number.

8. Is this authorization to be used for the exclusive purpose of developing radio equipment for export to be employed by stations under the jurisdiction of a foreign government? ☐ YES ☒ NO

If "YES", attach as EXHIBIT No. _____ the following information: Provide the contract number and the name of the foreign government concerned.

9. Is this authorization to be used for providing communications essential to a research project? (The radio communication is not the objective of the research project). ☐ YES ☒ NO

If "YES", attach as EXHIBIT No. _____ a narrative statement providing the following information:

(a) A description of the nature of the research project being conducted.

(b) A showing that the communications facilities requested are necessary for the research project involved.

(c) A showing that existing communications facilities are inadequate.

10. If all the answers to Items 7, 8, and 9, are "NO", attach as EXHIBIT No. _____ a narrative statement describing in detail the following:

(a) The complete program of research and experimentation proposed including description of equipment and theory of operation.

(b) The specific objectives sought to be accomplished.

(c) How the program of experimentation has a reasonable promise of contribution to the development, extension, expansion or utilization of the radio art, or is along line not already investigated.

11(a). Give an estimate of the length of time that will be required to complete the program of experimentation proposed in this application: 24 months

(b) If less than 2 years, give the length of time in months that the authorization requested in this application will be required: _____

12. Would a Commission grant of this application come within Section 11807 of the FCC Rules, such that it may have a significant environmental impact (see instruction 11)? ☐ YES ☒ NO

If "YES", attach as EXHIBIT No. _____ an Environmental Assessment as required by Section 11811.

13. List below transmitting equipment to be installed (if experimental, so state):

MANUFACTURER

MODEL NUMBER

NO. OF UNITS

Trimble

TNL 9001

3

12. Is the equipment listed in Item 18 capable of station identification pursuant to Section 5.152? ☒ YES ☐ NO

13. Will the antenna extend more than 6 meters above the ground, or if mounted on an existing building, will it extend more than 6 meters above the building, or will the proposed antenna be mounted on an existing structure other than a building? ☐ YES ☒ NO

If "YES", give the following (see instruction 9):

(a) Overall height above ground to tip of antenna is _____ meters.

(b) Elevation of ground at antenna site above mean sea level is _____ meters.

(c) Distance to nearest aircraft landing area is _____ kilometers.

(d) List any natural formations of existing man-made structures (hills, trees, water tanks, towers, etc) which, in the opinion of the applicant, would tend to shield the antenna from aircraft and thereby minimize the aeronautical hazard of the antenna.

(e) Submit as EXHIBIT No. _____ a vertical profile sketch of total structure including supporting building, if any, giving heights in meters above ground for all significant features. Clearly indicate existing portion, noting particulars of aviation obstruction lighting already available.

13. Applicant is: (Check only one box)

☐ INDIVIDUAL ☐ ASSOCIATION ☐ PARTNERSHIP ☒ CORPORATION

☐ OTHER (describe in space provided below)

17. Is applicant a foreign government or a representative of a foreign government? ☐ YES ☒ NO

18. Has applicant or any party to this application had any FCC station license or permit revoked or had any application for permit, license or renewal denied by this Commission? ☐ YES ☒ NO

If "YES", attach as EXHIBIT No. _____ a statement giving call sign of license or permit revoked and relate circumstances.

19. Will applicant be owner and operator of the station? ☒ YES ☐ NO

20. Give name, title, and telephone number (include area code), and Internet e-mail address (if applicable) of person who can best handle inquiries pertaining to this application.

21. APPLICANT ANTI-DRUG ABUSE CERTIFICATION:

By checking "YES", the individual applicant certifies that he or she is eligible for this license. This requires that he or she is not subject to a denial of federal benefits, including FCC benefits, as a result of a drug offense conviction pursuant to Section 560i of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862. A non-individual applicant, e.g., corporation, partnership or other unincorporated association, certifies that no party to the application is subject to a denial of federal benefits, pursuant to that section. For definition of a "party" for these purposes, see 47 CFR 1.2002(b).

☒ YES ☐ NO

22. List below all exhibits in numerical sequence and the item number of form requiring the exhibit identified.

EXHIBIT NUMBER	ITEM NO. OF FORM	EXHIBIT NUMBER	ITEM NO. OF FORM	EXHIBIT NUMBER	ITEM NO. OF FORM
1	10				

23 CERTIFICATION:

Attention: Read this certification carefully before signing this application.

THE APPLICANT CERTIFIES THAT:

- (a) Copies of FCC Rule Parts 2 and 5 are on hand; and
- (b) Adequate financial appropriations have been made to carry on the program of experimentation which will be conducted by qualified personnel; and
- (c) All operations will be on an experimental basis in accordance with Part 5 and other applicable rules, and will be conducted in such a manner and at such a time as to preclude harmful interference to any authorized station; and
- (d) Grant of the authorization requested herein will not be construed as a finding on the part of the Commission:
 - (1) that the frequencies and other technical parameters specified in the authorization are the best suited for the proposed program of experimentation, and
 - (2) that the applicant will be authorized to operate on any basis other than experimental, and
 - (3) that the Commission is obligated by the results of the experimental program to make provision in its rules including its table of frequency allocations for applicant's type of operation on a regularly licensed basis.

APPLICANT CERTIFIES FURTHER THAT:

- (e) All the statements in the application and attached exhibits are true, complete and correct to the best of the applicant's knowledge; and
- (f) The applicant is willing to finance and conduct the experimental program with full knowledge and understanding of the above limitations; and
- (g) The applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the USA.

Signed and dated this _____ day of February, 19 99

Name of Applicant COMSAT Mobile Communications
(must correspond with name given on page 1)

By Lilanie Geiger L. Geiger
(print) (signature)

Title Manager Service Development

Check appropriate classification:

- ☐ Individual applicant ☐ Member of applicant partnership
☒ Authorized employee ☐ Office of applicant corporation or association

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18 Section 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

**NOTIFICATION TO INDIVIDUALS UNDER PRIVACY ACT OF 1974
AND THE PAPERWORK REDUCTION ACT OF 1980**

Information requested through this form is authorized by the Communications Act of 1934, as amended, and specified by Section 808 therein. The information will be used by Federal Communications Commission staff to determine eligibility for issuing authorizations in the use of the frequency spectrum and to effect the provisions of regulatory responsibilities rendered by the Commission by the Act. Information requested by this form will be available to the public unless otherwise requested pursuant to 47 CFR 0.459 of the FCC Rules and Regulations. Your response is required to obtain this authorization.

Public reporting burden for this collection of information is estimated to average four (4) hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0065), Washington, DC 20554. DO NOT send completed applications to this address. Individuals are not required to respond to this collection unless it displays a currently valid OMB control number.

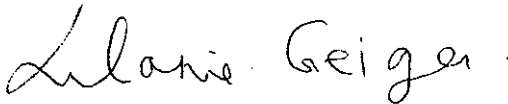
THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PL. 93-578, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, PL. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

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March 1996

To Whom It May Concern:

COMSAT Mobile Communications is a Satellite Communications Company providing Inmarsat service, seeking to commission three Inmarsat-C units for test and demonstration. I am applying to the FCC for permission to use all three terminals in the USA for test and demonstration. We have forwarded our FCC Form 442 to the FCC for a license to operate these units in the domestic US.

Sincerely,

A handwritten signature in cursive script that reads "Lilanie Geiger".

Lilanie Geiger
Manager Service Development
COMSAT Mobile Communications

JOSE R. ANDRADE
3840 TYNEWICK DR.
SILVER SPRING, MD 20906

DATE

Feb. 23, 1999

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7-7301/2520
BRANCH 11

PAY TO THE
ORDER OF

T. L. L.

\$45.⁰⁰

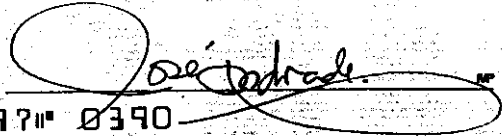
Forty-five and ^{xx}/₁₀₀

DOLLARS  Security features
included.
Details on back.

 **Provident**
BANK OF MARYLAND
BALTIMORE, MARYLAND 21203-1921

FOR

Trimble terminal commis. appl.



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