

August 4, 1998

By Express Delivery

Ms. Magalie Salas, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Attn Paul Marrangoni
Chief, Experimental Licensing Branch
Office of Engineering and Technology
Re: Request for Radio Station License

Dear Ms. Salas:

COMSAT Corporation, through its COMSAT Mobile Communications division (COMSAT), herein requests a radio station license, to be effective as soon as practicable, to operate thirteen (13) land-based Inmarsat ship earth stations from temporary-fixed locations in the U.S. In support of this request, COMSAT submits as follows:

These earth stations are COMSAT's main test and demonstration pool, and are or will be utilized for customer demonstrations, training, testing, service and equipment monitoring and troubleshooting, and similar purposes. Of the thirteen (13) terminals covered by this application, eleven (11) are existing ship earth stations covered by experimental special temporary authority, covered by call signs WA8XGG (file no. S-3300-EX-98) and WA2XGG (file no. 5608-EX-ML-96). Two earth stations -- both mini-M mobile terminals -- are new additions to the test and demonstration pool.

At the suggestion of Commission staff, COMSAT seeks radio station license authority of twenty-four months' duration covering each of these terminals. This is in lieu of six-month grants of experimental special temporary authority under which COMSAT has previously operated ship earth stations such as these. COMSAT respectfully requests an effective date of August 9, or as soon thereafter as possible, to minimize any downtime for some of these terminals that have license authorizations expiring on that date.

1. Applicant's Name and Address:

COMSAT Mobile Communications (CMC)
6560 Rock Spring Drive
Bethesda, Maryland 20817

2. Name and Address of the Person for Inquiries Regarding the Request:

Charles C. Tinker
Applications Engineer
Room 7907
6560 Rock Spring Drive
Bethesda, Maryland 20817
301-214-3160

3. Particulars of Operation:

<u>Inmarsat Standard</u>	<u>Frequency</u>	<u>Power</u>	<u>Modulating Signal</u>	<u>Necessary Bandwidth</u>
A	1626.5-1646.5 Mhz	36 dbw	FM	25 Khz
B	1626.5-1646.5 Mhz	27 dbw	O-QPSK	25 Khz
C	1626.5-1646.5 Mhz	14 dbw	600 Mps	2 Khz
M	1626.5-1646.5 Mhz	27 dbw	3-8 Kbps	16 Khz
mini-M	1626.5-1646.5 Mhz	14 dbw	BPSK 6 Kbps	12 Khz

4. Geographical Location of the Proposed Operation:

Rooftop, COMSAT Headquarters Building
6560 Rock Spring Drive
Bethesda, Maryland 20817
Lat. 39 N; Long. 77 W

Note: COMSAT anticipates that the two mini-M terminals will be based at its headquarters building for use on its balconies and rooftop. However, requests authority to operate these two terminals on a mobile basis throughout the U.S.

5. Antenna Type:

<u>Inmarsat Standard</u>	<u>Antenna Type</u>
A	Directional
B	Directional
C	Non-directional
M	Directional
mini-M	Directional

6. Transmitting Equipment:

<u>Manufacturer</u>	<u>Type</u>	<u>Standard</u>	<u>Number</u>
Japan Radio Co.	JUE-345B	B	1
Magnavox	MX2400	A	1
NERA	Saturn B	B	1
Scientific Atlanta	Maristar M	M	1
Thrane & Thrane	TT 3020C	C	1
Thrane & Thrane	TT 3022D	C	1
Thrane & Thrane	TT 3062B	mini-M	1*
Thrane & Thrane	TT 3064A	mini-M	1*
Thrane & Thrane	TT 3022A	C	2
Trimble Navigation	Galaxy Sentinel	C	1
Trimble Navigation	TNL 7002	C	2
Total units covered by this application			13

* New terminals, never previously licensed

COMSAT is a U.S. corporation organized under the laws of the District of Columbia. COMSAT 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 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 Commissions rules. The authorization sought herein will not be sought to fulfill the requirements of a government contract with an agency of the U.S. Government.

COMSAT further certifies that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 853a.

Accordingly, COMSAT respectfully submits that the public interest would be served by licensing the operation of the subject terminals for the aforementioned purposes, and thus it requests that the Commission grant the instant request for authority.

The requisite filing fee of \$45 is enclosed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John E. Benedict", written in a cursive style.

John E. Benedict

cc: Douglas Young
Carl Huie
Sylvia Lam