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May 20, 1997

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400.62 MHz
DY

Federal Communications Commission
Experimental Radio Services

P.O. Box 358320

Pittsburgh, PA 15251-5320

ATTN: Mr. Douglas A. Young
Office of Engineering & Technology

Re: *Final Analysis, Inc. Applications for Renewal of Experimental Little LEO Authorizations for: FAISAT-2v Little LEO Satellite (Call Sign KS2XCY, File No. 4682-EX-PL-95); Remote Terminals (Call Sign KS2XCZ, File No. 4683-EX-PL-95); and Logan, (Cache) UT Ground Station (Call Sign KS2XDA, File No. 4684-EX-PL-95).*

Dear Mr. Young:

Final Analysis, Inc., by its attorneys, hereby submits its applications for renewal of the above-captioned authorizations for its experimental non-voice non-geostationary mobile satellite service ("NVNG MSS" or "Little LEO") operations. Renewal is requested for the following components of the experimental program: (i) Little LEO satellite ("FAISAT-2v");¹ (ii) 350 remote user terminals;² and (iii) a ground station in

¹ See Final Analysis, Inc., Experimental Radio Station Construction Permit and Authorization, Call Sign KS2XCY (File No. 4682-EX-PL-95) issued August 11, 1995, expires August 1, 1997 (hereinafter "FAISAT-2v Authorization").

² See Final Analysis, Inc., Experimental Radio Station Construction Permit and License, Call Sign KS2XCZ (File No. 4683-EX-PL-95) issued August 11, 1995, expires August 1, 1997 (hereinafter "Remote Terminal Authorization").

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Logan, Utah.³ The initial authorizations for these components will expire on August 1, 1997. Accordingly, for the reasons stated below, Final Analysis respectfully urges the Commission expeditiously to grant the instant applications for renewal of the above-captioned authorizations for the basic two-year experimental operating period consistent with Sections 5.55(d) and 5.63 of the Commission's rules, 47 C.F.R. §§ 5.55(d), 5.63.

Grant of these renewal applications is in the public interest. A central purpose of Final Analysis's experimental satellite program is to determine the ability of NVNG MSS operations to coexist in certain frequency bands with existing users of those bands. To that end, Final Analysis initially planned to ship FAISAT-2v to Russia for integration in Omsk, Russia and launch as a secondary payload aboard a Cosmos rocket from the Cosmodrome in Plesetsk, Russia by the end of the first quarter of 1997. However, unforeseen circumstances beyond Final Analysis's control prevented Final Analysis from meeting the Cosmos rocket launch on April 17, 1997. In particular, multi-agency coordination was required upon FAISAT-2v's shipment to Russia between the U.S. Department of State and several Russian government agencies including the Russian foreign ministry and the Russian space agency.⁴ This lengthy coordination process delayed integration of FAISAT-2v's components in Omsk and prevented timely transport of the integrated satellite to Plesetsk on schedule for the April 17, 1997 launch. Nevertheless, a new launch date for FAISAT-2v aboard a Cosmos rocket is anticipated for the third quarter of 1997 and could occur as early as June, 1997. However, the initial authorizations for FAISAT-2v, as well as the remote user terminals and the Logan ground station, will expire on August 1, 1997. Accordingly, grant of renewed operating authority for an additional two-year experimental authorization period is necessary in order to allow Final Analysis to continue and complete the experimental program pursuant to its original goals.⁵

Moreover, grant of Final Analysis's renewal applications is consistent with the Commission's rules. Consistent with Section 5.55(d) of the Rules, Final Analysis's

³ See Final Analysis, Inc., Experimental Radio Station Construction Permit and License, Call Sign KS2XCY (File No. 4684-EX-PL-95) issued August 11, 1995, expires August 1, 1997 (hereinafter "Logan Ground Station Authorization").

⁴ See Final Analysis Quarterly Progress Report, filed on March 27, 1997.

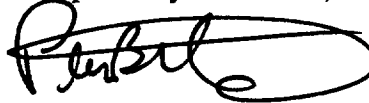
⁵ In light of the unexpected delay in the launch date for FAISAT-2v, Final Analysis is unlikely to be able to complete the experiment within the limited term of continuing operating authority that is automatically extended to a licensee upon the timely filing of a renewal application pending Commission action on the application. Cf. 47 C.F.R. § 1.62(d).

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experimental operations are in exact accordance with the terms of the existing authorizations for FAISAT-2v, the remote user terminals and the Logan ground station.⁶ Furthermore, Final Analysis's experimental operations are in full compliance with the Commission's experimental technical standards and operating rules⁷ and Final Analysis has timely submitted all required experimental progress reports.⁸

An original and two copies each of the renewal applications for the above-captioned authorizations are enclosed. Also included with this filing are three checks in the amount of \$45.00 each made out to the Federal Communications Commission for the appropriate filing fees (FCC Fee Code EAE). Please acknowledge receipt of this filing by date-stamping the enclosed duplicate for return with the courier. Please do not hesitate to contact undersigned counsel at the above-referenced number if you have any questions regarding this matter.

Respectfully submitted,



Peter A. Batacan[†]
Counsel for Final Analysis, Inc.

⁶ We note that subsequent additions to Final Analysis's experimental program are not subject to the instant renewal requests. Final Analysis has added a ground station at its corporate headquarters in Lanham, Maryland (*see* Experimental Radio Station Construction Permit and License, Call Sign WA2XHE (File No. 5582-EX-PL-97) issued April 10, 1997 expires April 1, 1999) and has applied for permanent experimental authority and currently holds special temporary operating authority with respect to an additional 148.7 MHz frequency for telemetry, tracking and control of FAISAT-2v at its Logan, Utah ground station (*see* Final Analysis, Inc. Application for Modification of Experimental Authorization for Fixed Ground Station at Logan, Utah, Call Sign KS2XDA, File No. 4684-EX-PL-95, filed on January 17, 1997 and Experimental Special Temporary Authorization Call Sign KS2XDA, File No. S-2779-EX-97 issued January 21, 1997, expires on July 21, 1997).

⁷ *See* 47 C.F.R. § 5.101 *et seq.*

⁸ *See* 47 C.F.R. § 5.204.

[†] Admitted in New York and Connecticut only.