

SES-STA-19990402-00626 *
March 31, 1999 **Granted**
date: 5/19/99 to 10/20/99 *
* See attachment
authorized by:
signature

By Express Delivery

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Attn Thomas S. Tycz, Chief
Satellite and Radiocommunication Division

Re: Request for Special Temporary Authority, Domestic Land-Based
Ship Earth Stations

Dear Ms. Salas:

COMSAT Corporation, through its COMSAT Mobile Communications division (COMSAT), herein requests a grant of special temporary authority, beginning April 1, or as soon thereafter as practicable, and continuing through April 20, 1999, to provide satellite communications services via the Inmarsat system between land-based ship earth stations and COMSAT's U.S. land earth stations at Southbury, Connecticut (WA-28) and Santa Paula, California (KA-31). In support of this request, COMSAT submits as follows:

LandSea Systems, Inc.

COMSAT, as U.S. Signatory to Inmarsat, has received a commissioning application from LandSea Systems, Inc. to operate one Inmarsat-M and three Inmarsat-C maritime terminals on a temporary fixed basis, at LandSea Systems' facilities in Virginia Beach, Virginia. COMSAT understands that LandSea Systems has applied to the FCC for license authority to operate these terminals at this location.

LandSea Systems is a company providing, among other services, specialized satellite communications services to the U.S. military, as well as the international maritime transport industry. We are advised that LandSea Systems wishes to use these terminals for a training class for LandSea Systems staff and military personnel in support of a demonstration program for the U.S. military of LandSea Systems communications

services. The class is scheduled for April 5 through April 16, 1999. LandSea Systems represents that the terminals will not be used for domestic U.S. service, apart from these tests. No other means of communications provide the Inmarsat global, voice and data capabilities that are essential for LandSea Systems training and test and demonstration obligations.

L-3 Communications

COMSAT, as U.S. Signatory to Inmarsat, has received a commissioning application from L-3 Communications to operate one Inmarsat-C land mobile terminal for use at L-3 Communications' Camden, New Jersey facilities. COMSAT understands that L-3 Communications has applied to the FCC for license authority to operate this terminal at this location.

L-3 Communications is a communications firm that develops, designs, and manufactures advanced communications systems, including for U.S. government customers. We are advised that L-3 Communications wishes to operate one Inmarsat-C land mobile terminal to perform a proof-of-concept capability devaluation as part of a larger prototype system. The system is to be used for U.S. military force protection. The user environment precludes any other means of communication. L-3 Communications represents that the terminal will not be used for domestic U.S. service, apart from these tests. As a manufacturer and developer of advanced Inmarsat communications equipment, opportunity to test equipment and communications programs is essential. No other means of communications can meet the proof-of-concept needs of this military test program.

Honeywell Aviation Services

COMSAT, as U.S. Signatory to Inmarsat, has received a commissioning application from Honeywell Aviation Services to operate one Inmarsat Aeronautical-H terminal, on a temporary fixed basis, at Honeywell's laboratory facilities in Phoenix, Arizona. COMSAT understands that Honeywell has applied to the FCC for license authority to operate this terminal at this location.

Honeywell is a manufacturer of advanced communications equipment and an aviation services company providing integrated aviation communications services. We are advised that Honeywell wishes to use an Inmarsat Aeronautical-H terminal for test and demonstration purposes as part of a contract program for the U.S. military. Operation of the terminal will be by Honeywell engineers. Honeywell represents that the terminal will not be used for domestic U.S. service, apart from these tests. No other means of communications provide the capability -- including both voice and packet data -- that is essential for Honeywell's test and demonstration program. As a manufacturer of Inmarsat communications equipment, and as a contractor to U.S. military users of Honeywell's Inmarsat equipment worldwide, it is essential that Honeywell have the ability to test its product at its U.S. laboratory.

Because the subject terminals utilize frequencies in the Maritime Mobile Satellite Service portion of the spectrum, frequency coordination will not be an issue. In any event, the subject terminals will operate on a non-interference basis with earth stations in the Maritime Mobile Satellite Service. COMSAT's regular charges for services such as these are set out in COMSAT Mobile Communications' Tariff FCC No. 1.

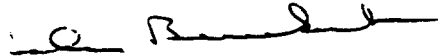
COMSAT respectfully submits that the public interest will be served through the provision of this communications capacity for the stated purposes and thus by a grant of the instant request for temporary authority.

The undersigned hereby certifies that neither COMSAT Corporation, the applicant, nor any other party to the foregoing 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.

The requisite filing fee of \$780 is enclosed.

COMSAT regrets the short notice associated with this request for Special Temporary Authority. Each of these terminal operators has represented to COMSAT that it requires immediate service to meet immediate requirements for training, test and demonstration programs that are urgently needed to support their U.S. military customers. Accordingly, COMSAT respectfully requests that this application be granted on an expedited basis.

Respectfully submitted,



John E. Benedict

Attachment

cc: Ron Repasi
Sylvia Lam
Carl Huie