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Domestic Facilities Division
Satellite Radio Branch
SEP 24 1990

Before the
Federal Communications Commission
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the matter of the Application of)
STARSYS, INC.)
For Authority to Construct a)
System of Low Earth Orbit)
Communications Satellites to be)
Stationed in an Inclined)
Non-geostationary Orbit)

File No. 33-DSS-P-90(24)

To: Common Carrier Bureau

RESPONSE OF
COMMUNICATIONS SATELLITE CORPORATION

Communications Satellite Corporation (COMSAT), through its World Systems Division, hereby responds to Starsys, Inc.'s ("STARSYS") Reply Comments filed with the Commission on September 4, 1990 in the above-captioned proceeding.

COMSAT's position, set forth in our Comments, is that to the extent STARSYS provides international communications services, its system operations should be subject to the same policies and conditions as apply to U.S. separate systems. Separate Systems, 1 FCC Rcd 439 (1986); Separate Systems, 61 RR 2d 649 (Reconsideration Order) (1986); Separate Systems, 101 FCC 2d 1046 (1985).

In reply, STARSYS states that COMSAT "overlooks the fact that STARSYS has filed a domestic satellite system application" and that "[t]o the extent COMSAT argues that even transborder services via STARSYS's system should be subject to the separate systems requirements, its assertions should be rejected outright." STARSYS Reply at 9.

It is our view that STARSYS' proposed system cannot be characterized as a domestic system. STARSYS proposes to construct, launch and operate a system of 24 satellites placed in low earth orbits and providing coverage to the entire world. It states that its "system will be capable of providing 24-hour two-way communications and position determination service everywhere in the world." STARSYS Application at 2. Further, STARSYS states that its "[p]rimary and back-up Processing, Analysis and Control Centers (PACCs) in the United States will interconnect with the global telecommunications network via standard interfaces (including X.25)." id. STARSYS also claims that its system is "an Inherently Global System" and "would be the world's first satellite system that is generally available worldwide." STARSYS Application at TC-4; III-9. STARSYS further claims that its "STARNET system is uniquely able to provide an integrated telecommunications link anywhere in the world ... " STARSYS Application at III-9.

Thus, the STARSYS proposal cannot be presented as a domestic satellite system providing incidental transborder services, but is an international system fully subject to separate system policies.

Respectfully submitted,
COMMUNICATIONS SATELLITE CORPORATION
World Systems Division

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September 21, 1990

CERTIFICATE OF SERVICE

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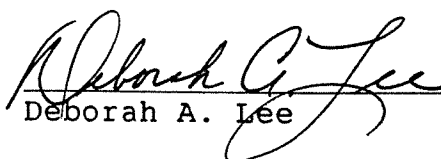
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