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AUG 14 1990

Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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AUG 16 1990

Domestic Facilities Division
Satellite Radio Branch

In the Matter of the Application of)
STARSYS, INC.)
For Authority to Construct, Launch)
and Operate a Low-Orbit, Mobile)
Satellite System.)

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

COMMENTS

Communications Satellite Corporation ("COMSAT"), through its World Systems Division, hereby submits comments on the above-referenced "Application" filed by STARSYS, Inc.

("STARSYS"). STARSYS proposes to construct, launch and operate a system of 24 satellites to be distributed randomly on 50 to 60 degree inclined planes in circular orbits approximately 1,300 kilometers above the earth.

COMSAT does not oppose the Application. However, to the extent that STARSYS provides international communications services, we submit that STARSYS would 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). Further, to the extent maritime services

are contemplated, STARSYS would be obliged to comply with the notification procedures set forth in Article 8 of the Inmarsat convention.

Respectfully submitted,

COMMUNICATIONS SATELLITE CORPORATION
World Systems Division

By *Linda M. Wellstein/dal*
Linda M. Wellstein
950 L'Enfant Plaza
Washington, D.C. 20024
(202) 863-6018

Its Attorney

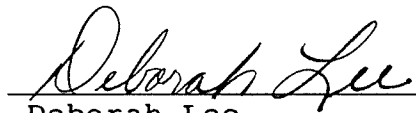
August 14, 1990

CERTIFICATE OF SERVICE

I Deborah Lee, do hereby certify that a copy of the foregoing Comments was served by Hand, this 14th day of August 1990, on the following:

Dr. Ashok Kaveeshwan
STARSYS, Inc.
2000 K Street, N.W.
Suite 620
Washington, D.C. 20006

Raul R. Rodriguez, Esq.
Stephen D. Baruch, Esq.
Leventhal, Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006-1809



Deborah Lee