



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

INTERNATIONAL BUREAU

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May 13, 1997

Hogan & Hartson L.L.P.
555 Thirteenth Street, N.W.
Washington, D.C. 20004

Attention: Peter A. Rohrbach
Karis A. Hastings

Re: Starsys Global Positioning, Inc.: Commencement of Construction

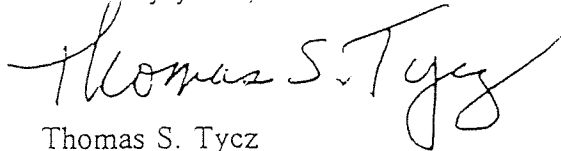
Dear Mr. Rohrbach and Ms. Hastings:

The Order and Authorization granting Starsys's Little LEO license application, which was issued on November 20, 1995, declared that unless extended for good cause the license would become null and void in the event that specified implementation deadlines were not met, including one requiring construction of the first two system satellites to commence by November 1996. Starsys Global Positioning, Inc., 11 FCC Rcd 1237 at ¶28. In a petition filed on February 12, 1997, Leo One USA Corporation alleged that a press report published on January 13, 1997 indicated that construction had not yet begun on any of the satellites for Starsys's system.

The Commission has regarded the timely execution of a non-contingent construction contract as fulfilling the construction-commencement condition in satellite licenses. *See, e.g.*, Letter from Chief, Domestic Facilities Division to GE American Communications, Inc. (June 7, 1990). In the "Opposition" that you filed for Starsys on February 26, 1997, you asserted that "Starsys has a contract with Alcatel Espace in force that will permit Starsys to meet the construction completion and launch dates specified in the ... authorization." It is not clear from this statement when the contract was signed, whether it is subject to any material

contingencies, and whether it requires Alcatel to complete construction of the first two satellites by the pertinent deadline specified in ¶28 of the Order and Authorization. Please furnish that information within 15 days of the date of this letter by submitting an attested copy of the contract.

Sincerely yours,



Thomas S. Tycz
Chief, Satellite and Radiocommunication Division
International Bureau

cc: Robert A. Mazer
Albert Shuldiner
Vinson & Elkins L.L.P.
1455 Pennsylvania Avenue, N.W.
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Counsel for Leo One USA Corporation