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JUN 3 - 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
MOTOROLA SATELLITE COMMUNICATIONS, INC.)	File Nos. 9-DSS-P-91(87)
and)	CSS-91-010
ELLIPSAT CORPORATION)	
Applications For L-Band Low Earth)	File No. 11-DSS-P-91(6)
Orbit Satellite Systems)	

To The Commission:

Comments

GTE Spacenet Corporation ("GTE Spacenet") hereby submits Comments on the above-captioned applications and respectfully states as follows:

GTE Spacenet has been authorized by the Commission to carry three Radiodetermination Satellite Service ("RDSS") receive-only payloads aboard its SPACENET III and GSTAR III satellites.¹ These RDSS payloads enable the provision of RDSS service to the public on an interim basis until dedicated RDSS facilities are available.² These payloads are authorized to receive earth-to-space transmissions from RDSS user terminals in the 1610-1626.5 MHz frequency band (L-Band), convert these signals to Ku-Band frequencies, and route them to a Ku-Band

¹ GTE Spacenet Corporation, Order and Authorization, Mimeo 5175; 1 FCC Rcd 1163 (1986); 4 FCC Rcd 8461 (1989).

² These RDSS payloads were initially constructed to meet the needs of a particular RDSS licensee who desired to use them as its interim RDSS system to begin immediate start-up RDSS service pending completion of its dedicated system. While this RDSS licensee no longer has a need for these facilities, the payloads remain available for other L-Band service providers (assuming the requisite FCC authority has been obtained) to provide similar RDSS-type service.

transponder for retransmission back to earth. Thus, GTE Spacenet, as the licensee of facilities authorized to operate at L-Band, is interested in the above-captioned applications.

Both the Motorola and the Ellipsat applications seek authority to offer, inter alia, RDSS-type services from Low Earth Orbit (LEO) satellites that will operate in the 1610-1626.5 MHz frequency band. GTE Spacenet's Comments on these applications are limited solely to the issue of L-Band intersatellite licensee coordination. As with domestic-fixed satellites licensees, which are required to engage in intersatellite coordination³ to avoid undue harmful interference and to ensure compatible operations for the provision of quality service to end-users, GTE Spacenet requests that the Commission impose similar coordination requirements on licensees authorized to operate facilities in the 1610-1626.5 MHz frequency bands. To this end, GTE Spacenet expects that Motorola, Ellipsat and any other licensee eventually authorized for operations at 1610-1626.5 MHz agree to coordinate with GTE Spacenet and/or any entity providing service via the RDSS payloads aboard GTE Spacenet's satellites, to ensure interference-free operations for all licensees operating in this band.

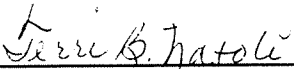
GTE Spacenet's Comments herein are not intended to signal to the Commission that GTE Spacenet anticipates interference problems to its licensed L-Band payloads from any of the currently proposed LEO satellite systems. In fact, GTE Spacenet has reviewed in detail the CCIR document⁴ of the Joint Interim Working Party to WARC-92 on sharing the 1.6 GHz uplink (i.e. 1610-1626.5 MHz) between LEO and RDSS systems and concluded that sharing does appear feasible based on the parameters specified in the document.

³ See e.g. 3 FCC Rcd 6972 (1988).

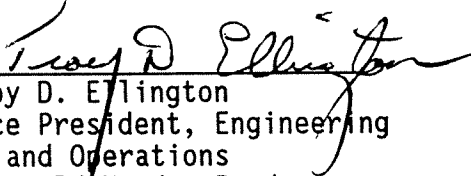
⁴ Corrigendum 1 to Document JIWP92/54-E 5 March 1991, CCIR Joint Interim Working Party WARC-92 Geneva, 4-15 March 19910.

To the extent, however, that the parameters which formed the basis of the CCIR sharing proposal are not binding on any RDSS or LEO licensee unless specifically made part of their license terms, GTE Spacenet requests that, similar to domestic-fixed satellite licensees, any licensee authorized to operate in the 1610-1626.5 frequency band be required to coordinate with other licensees authorized to operate facilities in that band, including GTE Spacenet's RDSS payloads, to the extent necessary to prevent harmful interference to users of those facilities.

Respectfully submitted,
GTE SPACENET CORPORATION



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June 3, 1991

CERTIFICATE OF SERVICE

I, Karen M. Cameron, hereby certify that copies of the foregoing "Comments" were served by first-class mail, postage prepaid, this 3rd day of June, 1991, to the following:

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JUN 4 1991

DOMESTIC FACILITIES DIVISION
SATELLITE RADIO BRANCH

June 3, 1991

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Applications of Motorola Satellite Communications, Inc. for L-Band Low Earth Orbit Satellite Systems, File Nos. 9-DSS-P-91(87)/CSS-91-010 and Ellipsat Corporation for L-Band Low Earth Orbit Satellite Systems, File No. 11-DSS-P-91(6)

Dear Ms. Searcy:

Transmitted herewith for filing on behalf of GTE Spacenet Corporation is an original and required copies of its Comments in the above-captioned proceeding.

Should any questions arise, please contact the undersigned.

Sincerely,

Terri B. Natoli
Terri B. Natoli

TBN/kmc

Enclosures