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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Satellite Policy Branch
International Bureau

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MANILA, THE PHILIPPINES
MUMBAI, INDIA

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20054

Re: Final Analysis Communication Services, Inc. - Application for Clarification and Review of Non-Voice Non-Geostationary Mobile Satellite Service ("NVNG MSS") License, 13 FCC Rcd 6618 (1988); (File No. 7-SAT-AMEND-98)

Dear Ms. Salas:

Attached hereto, on behalf of Final Analysis Communication Services, Inc. ("Final Analysis"), is a copy of a letter dated March 26, 2000 to Mr. Donald Abelson, Chief of the International Bureau, by Richard F. Ambrose, Vice President of Space Systems for Raytheon. Kindly place a copy of the letter, along with this cover note, in the file for the above referenced-matter.

Mr. Ambrose's letter describes Raytheon's recent agreement to become a strategic equity partner responsible for the ground segment of Final Analysis's NVNG MSS system. Raytheon is recognized as a world leader in the design and implementation of reliable satellite command and control systems, and therefore will play a critical role in ensuring the reliability of Final Analysis's system. Most importantly, Raytheon's decision to make a significant equity investment in Final Analysis was supported by exhaustive due diligence of Final Analysis's system design and business plan.

We believe that this speaks volumes, about Raytheon's confidence in Final Analysis's business, its agreement that Final Analysis's proposed constellation modifications are necessary and appropriate to meet market requirements, and its endorsement of the position Final Analysis has taken in its pending Application for Clarification and Review.

Ms. Magalie R. Salas
Secretary
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In fact, all of the following highly esteemed companies have expressly agreed that Final Analysis's system will not cause additional potential interference to other commercial and government users:

- Raytheon Space Systems
- General Dynamics Information Systems;¹
- Lockheed Martin Management and Data Systems;²
- ITT Corporation;³
- W.L. Pritchard & Co.;⁴
- Mitretek.⁵

The commercial licensees themselves, including Orbital Communications Corporation ("ORBCOMM"), E-SAT, Inc. and Volunteers in Technical Assistance, have indicated they have no objections to Final Analysis's Application for Clarification and Review.⁶ Leo One Worldwide, Inc. ("Leo One") is the only licensee with objections remaining, but has raised no issues not considered by the other licensees.

¹ See, Letter dated January 11, 1999 from James I. Finley, President of General Dynamics Information Systems to Regina Keeney, Chief of the International Bureau.

² See, Consolidated Engineering Statement attached to Final Analysis's June 2, 1998 Reply to Leo One's May 20, 1998 Opposition in this proceeding.

³ Id.

⁴ Id.

⁵ Mitretek, which was hired by the National Oceanic and Atmospheric Administration to perform a study, independently concluded that any increase in potential interference due to the expansion of Final Analysis's constellation likely would be infinitesimal and insignificant. See, Letter dated November 16, 1999 from Aileen A. Pisciotta, Counsel to Final Analysis, to Donald Abelson, Chief, International Bureau.

⁶ ORBCOMM has one issue remaining, which is not unique to Final Analysis. ORBCOMM considers itself as a first round licensee to have priority in coordination with respect to all second round NVNG MSS licensees.

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Consequently, we urge the Commission to find that approval of Final Analysis's requested modifications is in the public interest.

Respectfully submitted,



Aileen A. Pisciotta
Counsel for Final Analysis Communication Services, Inc.

Attachment
cc: Attached Service List

Raytheon

**Raytheon Command, Control,
Communication and
Information Systems**
16800 East CentreTech Parkway
Aurora, Colorado
80011-9046 USA
303.344.6000

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FEDERAL COMMUNICATIONS COMMISSION
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APR 5 2000

Satellite Policy Branch
International Bureau

26 March 2000

Mr. Donald Abelson
Chief, International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Final Analysis Communication Services, Inc., Application for
Clarification and Review of Non-Voice Non-Geostationary Mobile
Satellite Service ("NVNG MSS") Order and Authorization, 13 FCC
Rcd 6618 (1998)**

Dear Mr. Abelson:

The Space Systems unit of Raytheon Company ("Raytheon") is very pleased to inform you that it recently concluded an agreement with Final Analysis Communication Services, Inc. ("Final Analysis") and General Dynamics Information Systems ("General Dynamics") to become a strategic partner in the design and implementation of Final Analysis' NVNG MSS system that includes an equity position. Raytheon is writing this letter to share information that may be helpful to the Commission in resolving some of the issues currently pending concerning Final Analysis' license.

Specifically, under the agreement, Raytheon will complete the design and construction of Final Analysis' ground segment, including the global network control center, network operations centers, RF ground stations, satellite control centers and the terrestrial backbone infrastructure. Raytheon also will implement standardized accounting and billing systems that will support the wholesale and retail operations of Final Analysis' national service providers and value added resellers.

Raytheon was selected by Final Analysis and General Dynamics as the ground segment partner because it is a recognized global leader in the provision of reliable, cost-effective satellite command and control system solutions. Consequently, the reliability and control of the Final Analysis system will be significantly enhanced by the combination of the ground segment designed by Raytheon and the other fail safe measures for the space segment mentioned in the letter dated January 11, 1999, from James I. Finley, President of General Dynamics Information Systems to Regina Keeney, then Chief of the International Bureau. This should ensure the Commission that, on an absolute scale, the probability of failure of the Final Analysis system and the possibility of any harmful interference to any other users of the same spectrum due to any failure of the Final Analysis system is extremely low.

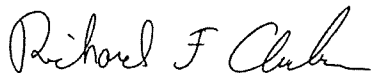
Mr. Donald Abelson
Federal Communications Commission, International Bureau
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Perhaps most significantly, in addition to providing the ground segment, Raytheon has made an equity investment in Final Analysis. Raytheon's dual responsibility as a ground contractor and an investor, strengthen our interest in seeing Final Analysis succeed. We firmly believe that Final Analysis requires approval of the requested amendment to bring their services to market and meet end customer requirements that drive satellite capacity and geographic coverage.

Making the commitment to FACS has required that Raytheon conduct comprehensive and exhaustive analysis of Final Analysis' business plan, technology and market approach. In the course of our analysis we noted, among other things, that other industry leaders, including Lockheed Martin Management and Data Systems, ITT Corporation, and W.L. Pritchard & Co., Inc., along with General Dynamics, have placed statements on the record concluding that Final Analysis' proposed system will not cause harmful interference to other commercial licensees and actually reduces the potential for interference to government users in shared bands. Our RF Ground Station design parameters also aid in mitigating the potential for interference.

I am convinced that Final Analysis is poised to be a leader in the NVNG MSS industry, and we are very excited to be part of the Final Analysis team. To permit Final Analysis and its partners to bring this worthy system to market on a timely basis, we respectfully urge you to act expeditiously to approve Final Analysis' pending license request.

Sincerely yours,



Richard F. Ambrose
Vice President, Space Systems

CERTIFICATE OF SERVICE

I, Aileen A. Pisciotta, hereby certify that a true and correct copy of the foregoing **Letter to Ms. Magalie R. Salas**, on behalf of Final Analysis Communication Services, Inc., was delivered by hand or regular mail this 3rd day of April 2000, to the individuals on the following list:

Mr. Donald Abelson*
Chief, International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mr. Thomas Tycz, Chief*
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Chairman William E. Kennard*
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Mr. Harold Ng, Chief*
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Satellite and RadioCommunication Division
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Commissioner Gloria Tristani*
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Commissioner Susan Ness*
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Aileen A. Pisciotta

* Via Hand Delivery