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June 7, 2001

VIA HAND DELIVERY

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

S2356 SAT-AMD-20010607-00050
KASTARCOM. WORLD SATELLITE. LLC
KaStarCom

Re: ***KaStarCom World Satellite, LLC***
File No. SAT-LOA-19980312-00018
Response to Commission Staff Request

Dear Ms. Salas:

At the informal request of Commission staff, this letter is filed on behalf of KaStarCom World Satellite, LLC ("KaStarCom") to re-affirm KaStarCom's preference for spectrum for uplink and downlink operations, inter-satellite links, telemetry, tracking & control, and transfer orbit and emergency operations. The attached Appendix A provides this information.

Commission staff also requested information concerning the manner in which KaStarCom proposes to operate its satellites. To reiterate information contained in its letter to the Commission staff dated June 1, 2001, KaStarCom has expressed a preference for the following orbital assignments:

73° W.L.	500 MHz
109.2° W.L.	500 MHz
111° W.L.	1000 MHz

WB Holdings 1, LLC ("WB") holds orbital assignments in the Ka-band for the 73° W.L. and 109.2° W.L. orbital locations, and currently is in the process of constructing its authorized satellites. Therefore, if the authorizations are granted as proposed by KaStarCom, WB and KaStarCom would share those two orbital locations, though they would operate on different frequencies.

KaStarCom envisions that, as licensees of co-located Ka-band satellites at 73° W.L. and 109.2° W.L., WB and KaStarCom would jointly construct and own a single satellite at each such location. Consistent with Commission policy, KaStarCom and WB each would maintain control of its authorized spectrum segment and the operations to be



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conducted thereunder. Specifically, KaStarCom would be responsible for monitoring the operation of the satellites using its assigned frequencies in order to ensure compliance with the Commission's rules, including requirements for satellite coordination and other technical aspects of space station operation. In addition, KaStarCom would retain exclusive control over operations on the frequencies assigned to it, and access to and from the KaStarCom capacity on those satellites. Both WB and KaStarCom would have the right and ability to cease their respective operations on the satellites or the relevant transponders upon Commission request.

Please contact undersigned counsel if any questions arise concerning this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stephen E. Coran', written over a horizontal line.

Stephen E. Coran

Counsel to KaStarCom World Satellite, LLC

cc: Donald Abelson
Thomas Tycz
Fern Jarmulnek
Jennifer Gilseman
Selina Khan

Appendix A

When fully deployed, KaStarCom will use the following frequency bands for its operations at the 73° W.L., 109.2° W.L., and 111° W.L. orbital locations:

Orbital Location	Ground-to-Space Communications	Space-to-Ground Communications
73° W.L.	29.5-30.0 GHz	19.7-20.2 GHz
109.2° W.L.	28.35-28.6 GHz and 29.25-29.5 GHz	18.3-18.8 GHz
111° W.L.	28.35-28.6 GHz and 29.25-29.5 GHz and 29.5-30.0 GHz	18.3-18.8 GHz and 19.7-20.2 GHz

For in-band tracking, telemetry and command (TT&C), KaStarcom, when fully deployed, will use the following frequency bands:

Orbital Location	Ground-to-Space		Space-to-Ground	
	Satellite Command	Satellite Tracking Beacon	Satellite Telemetry	Rain Beacon
73° W.L.	29.995-30.000 GHz	29.500-29.505 GHz	19.700-19.705 GHz	20.195-20.200 GHz
109.2° W.L.	28.350-28.355 GHz	29.250-29.255 GHz	18.300-18.305 GHz	18.795-18.800 GHz
111° W.L.	29.995-30.000 GHz	29.500-29.505 GHz	19.700-19.705 GHz	20.195-20.200 GHz

For orbit raising and contingency operations, KaStarcom, when fully deployed, will use the following frequency bands:

Orbital Location	Ground-to-Space Orbit Raising/ Contingency	Space-to-Ground Orbit Raising/ Contingency
73° W.L.	5.8565-5.8600 GHz and 6.4205-6.4240 GHz	3.7000-3.7035 GHz and 4.1960-4.1995 GHz
109.2° W.L.	5.8565-5.8600 GHz and 6.4205-6.4240 GHz	3.7000-3.7035 GHz and 4.1960-4.1995 GHz
111° W.L.	5.8565-5.8600 GHz and 6.4205-6.4240 GHz	3.7000-3.7035 GHz and 4.1960-4.1995 GHz

For intersatellite links (ISLs), KaStarcom, when fully deployed, will use the following frequency bands:

Orbital Location	Intersatellite Links
73° W.L.	69.0-70.0 GHz
109.2° W.L.	69.0-70.0 GHz
111° W.L.	69.0-70.0 GHz