



FILE COPY

*General Aviation
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May 3, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, Room TW-A325
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: File Nos. CSS-90-017
[IBFS File Nos. SAT-LOA-19900723-00002];
SAT-AMD-19990125-00016

Dear Ms. Salas:

This letter concerns the pending proposals by WorldSpace, Inc. and its subsidiary, AfriSpace, Inc., to obtain a regular license for the AfriStar satellite. In particular, we wish to underscore the need for the Commission to scrutinize WorldSpace's qualifications to receive the above-referenced authorization given its proposal to also launch a satellite (CARIBSS) which would cause serious interference to the civil aircraft industry's flight test activities.

By way of background, the General Aviation Manufacturers Association (GAMA) represents over 50 U.S. manufacturers of general aviation aircraft, engines and component parts. Our members employ over 100,000 Americans and are located throughout the United States. GAMA's members include major manufacturers, such as Cessna and Beechcraft, and start-up companies like Avidyne Corporation.

GAMA members rely heavily on L-band frequencies in order to flight test new and modified aircraft. Such testing is a prerequisite for issuance of FAA Part 25 airworthiness certificates. Moreover, L-band telemetry frequencies are vital to the productivity of the U.S. general aviation industry – an industry which is subject to intense competition from foreign firms. Lastly, interference-free availability of such frequencies is an important flight safety issue. When testing a new aircraft, it is essential that ground personnel have clear communications on the health of the aircraft and its components: L-band telemetry provides that communications link.

Unfortunately, the WorldSpace organization has pursued a coordination strategy for CARIBSS which threatens these communications links. Indeed, based on their official filings it appears they would virtually blanket the U.S. with L-band coverage with CARIBSS, even though that satellite is

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nominally supposed to cover Central and South America. This would cause massive disruption to our members' flight testing.

GAMA is aware of the filings made by Aerospace & Flight Test Radio Coordinating Council (AFTRCC) in connection with the matter referenced above and endorses AFTRCC's call for the Commission to defer action on the WorldSpace application pending a resolution of this matter or, if need be, to deny the proposal.

An original and one copy of this letter are supplied for inclusion in the public record of this matter.

Sincerely,



Edward M. Bolen
President & CEO