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Federal Communications Commission
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

CHIEF OF BUREAU
CARRIER BUREAU

In the Matter of)
)
 NORRIS SATELLITE COMMUNICATIONS, INC.)
)
 Petition For Amendment of Parts 2) RM-7511
 and 25 of the Commission's Rules to)
 Establish a General Satellite Service)
 in the Ka-Band)

Application To Launch and Operate) File Nos. 54-DSS-P/L-90
 Communications Satellites in the) 55-DSS-P/L-90
 Domestic Fixed-Satellite Service)

To: The Commission

COMMENTS OF AMERICAN MOBILE SATELLITE CORPORATION

American Mobile Satellite Corporation ("AMSC"), by its attorneys, hereby comments on the Petition for Rulemaking and Application filed by Norris Satellite Communications, Inc. ("Norris") proposing that the Commission re-allocate the band 19.7-20.2/29.5-30.0 GHz to a General Satellite Service ("GSS") in which fixed, broadcast, mobile and personal access satellite services could be provided.^{1/} As discussed more fully below, AMSC disagrees with Norris's contention that its proposed GSS system operating in Ka-band will alleviate the need for additional L-band allocations for Mobile Satellite Service ("MSS").

In support of its Petition and the underlying application, Norris claims that its proposed satellite system can serve demand

^{1/} AMSC is licensed by the Commission to construct and operate the U.S. mobile satellite service system. AMSC Authorization Order, 4 FCC Rcd 6041 (1989).

for MSS that cannot be met using L-band allocations.^{2/} As evidence of this excess demand, Norris points out that AMSC has requested additional frequencies for MSS.^{3/}

AMSC agrees with Norris that more spectrum is needed for MSS. AMSC has begun international coordination negotiations with two of the administrations that have planned or operational MSS systems (there are more than 30 such systems) in the spectrum assigned to AMSC, and it is already evident that there are immediate and serious problems with securing adequate spectrum for a U.S. domestic system. In other proceedings, AMSC has requested that it be assigned specific L-band frequencies for MSS.^{4/} AMSC will provide the Commission with additional suggestions for L-band MSS allocations in AMSC's comments that will be submitted in response to the Commission's Second Notice of Inquiry on the 1992 World Administrative Radio Conference.^{5/}

Norris's proposal does not, however, hold out an immediate prospect for solving the spectrum shortage for MSS in the L-band. At some point, the Ka-band may be a viable band for MSS, but at present there is no consumer equipment available for the band. Moreover, it would be extremely impractical for a single MSS satellite to operate in both the L-band and the Ka-band.

^{2/} Application at I-10.

^{3/} Id. at I-19.

^{4/} See Comments of AMSC, Docket No. 90-56 (May 11, 1980); Comments of AMSC, RM-7400 (August 20, 1990).

^{5/} Second Notice of Inquiry, GEN Docket No. 89-554 (rel. October 1, 1990).

Therefore, AMSC respectfully requests that any Commission action on the Norris Petition and Application not be viewed as a solution to the L-band spectrum shortage facing the domestic MSS system.

Respectfully submitted,

AMERICAN MOBILE SATELLITE
CORPORATION

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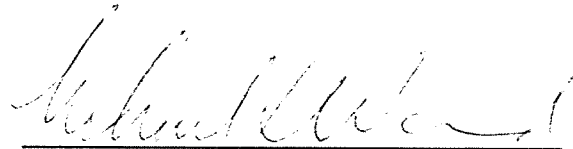
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Dated: November 13, 1990

AMERICAN MOBILE SATELLITE CORPORATION**DECLARATION**

I, Michael Ward, under penalty of perjury, do hereby declare as follows: I have reviewed the foregoing Comments of American Mobile Satellite Corporation. The facts contained therein are true and correct to the best of my knowledge and belief.



Michael Ward
Senior Scientist
American Mobile Satellite
Corporation


DATE: 11-12-90

CERTIFICATE OF SERVICE

I, Ruth E. Davis, a secretary in the law offices of Gurman, Kurtis, Blask & Freedman, Chartered, do hereby certify that on this 13th day of November, 1990, a copy of the foregoing "Comments of American Mobile Satellite Corporation" was sent by U.S. first class mail, postage prepaid to:

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