



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

August 24, 1999

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AUG 24 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

RE: Application for Review and Clarification, Final Analysis Communications Services, Inc.,
File Nos. 25-SAT-P/LA-95, 76-SAT-AMEND-95,
79-SAT-AMEND-96, 151-SAT-AMEND-96, 7-SAT-AMEND-97

Dear Ms. Salas:

Enclosed you will find an two copies of the letter from William T. Hatch, Acting Associate Administrator, National Telecommunications and Information Administration, to Nader Mondanlo, Chairman and President of Final Analysis Communications Services, regarding the above-referenced proceeding. A copy of this letter was hand-delivered to Don Abelson, Chief of the International Bureau, and Tom Tycz, Chief of the Satellite and Radiocommunications Division, International Bureau. As indicated in the Certificate of Service, the other parties to the proceeding have also been served.

Please direct any questions you may have regarding this filing to the undersigned. Thank you for your cooperation.

Respectfully submitted,

Kathy D. Smith
Acting Chief Counsel

Enclosures



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Mr. Nader Modanlo
Chairman and President
Final Analysis Communication Services
9701-E Philadelphia Court
Lanham, MD 20706-4400

Dear Mr. Modanlo:

I received your letter of July 19, 1999 and I am concerned that you have misunderstood our letter of July 8 responding to your request to begin technical coordination on your proposed, but not licensed, system. You have not correctly interpreted the Government's requirements for systems operating on a timeshared basis with government systems. It was not our purpose to restate the requirements laid out in FCC rules or the provisions of your license in response to your request to initiate post-license coordination. We, of course, are aware of your opposition to certain aspects of your license. Because of its importance to post-license coordination, we note in your letter that you are committed to fully comply with FCC's Rules in Section 25.259(b) and (c). As we stated in our letter, compliance with these rules, as well as paragraph 39 of your license, with practical implementation measures, including monitoring, is of critical concern to us to ensure the continued viability of the NOAA satellite system.

As we have stated before, the FCC has all of the information it needs to make its decision on your license. We appreciate your interest in resolving your license with the FCC as soon as possible so that we can begin post-license coordination. Until the FCC concludes this matter, we see no benefit to our continued debate on these questions, a debate which may itself be causing delay in the FCC reaching its decision.

Sincerely,

William T. Hatch
Acting Associate Administrator
Office of Spectrum Management

cc: Don Abelson, Chief, International Bureau

CERTIFICATE OF SERVICE

I, Teresa Goode, do hereby certify that a copy of the foregoing Letter from the National Telecommunications and Information Administration was hand-delivered (*) or sent via first class United States mail, on this 24th day of August, 1999, to the following:

Mr. Nader Modanlo
Chairman and President
Final Analysis Communications Services
9701-E Philadelphia Court
Lanham, MD 20706-4400

Aileen Pisciotta, Esq.
Peter A. Batacan, Esq.
Kelly, Drye & Warren, LLP
1200 - 19th Street, N.W.
Suite 500
Washington, DC 20554

Mr. Don Abelson*
Chief, International Bureau
Federal Communications Commission
The Portals
445 Twelfth Street, S.E.
Washington, DC 20554

Robert A. Mazer, Esq.
Vinson & Elkins
1455 Pennsylvania Avenue, N.W.
Washington, DC 20004-1008

Mr. Tom Tycz*
Chief, Satellite & Radiocommunication
Division
International Bureau
Federal Communications Commission
The Portals
445 Twelfth Street, S.E.
Washington, DC 20554

Stephen Goodman, Esq.
Halprin, Temple & Goodman
1100 New York Avenue, N.W.
Suite 650 East
Washington, DC 20005

Mr. Nelson Pollack
AFFMA
4040 North Fairfax Drive
Suite 204
Washington, DC 22203-1613

Henry Goldberg, Esq.
Joseph Godles, Esq.
Mary Dent, Esq.
Goldberg, Godles, Wiener & Wright
1229 - 19th Street, N.W.
Washington, DC 20036

Mr. Richard Barth
U.S. Department of Commerce
National Oceanic and Atmospheric
Administration
Office of Radio Frequency Management
Room 2246, SSMC-2
1325 East West Highway
Silver Spring, MD 29010

Leslie Taylor, Esq.
Leslie Taylor Associates, Inc.
6800 Carlynn Court
Bethesda, MD 20817-4302



Teresa Goode



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Sincerely,

William T. Hatch
Acting Associate Administrator
Office of Spectrum Management

cc: Don Abelson, Chief, International Bureau

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