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

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In the Matter of )	
Globalstar, L.P. )	
Application to Launch and Operation a )	File Nos. 182 -- 186-SAT-P/LA-97
Mobile Satellite System in the 2 GHz )	
Frequency Band )	
And )	
Iridium, LLC )	
Application to Launch and Operate a Low )	File No. 187-SAT-P/LA-97
Earth Orbit Satellite System in the 2 GHz )	
Frequency Band )	
_____ )	

**COMMENTS OF  
ICO SERVICES LIMITED**

ICO Services Limited ("ICO"), in response to the Federal Communications Commission's ("FCC" or "Commission") Public Notice, Satellite Policy Branch Information, Report No. SPB-106 (rel. Oct. 15, 1997) ("Notice"), submits its comments on the above-captioned applications to the extent they request spectrum in the 28.35-28.6 GHz, 29.1-30 GHz, 18.35-18.60 GHz and 19.3-20.2 GHz frequency bands (collectively "Ka-band frequencies").

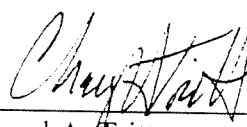
The Notice seeks comment on applications that the Commission has accepted for filing to operate in the Ka-band frequencies. The above-captioned applications of GlobalStar, L.P. and Iridium LLC were among those applications accepted for filing, although GlobalStar and Iridium plan to launch and operate mobile satellite service systems in the 2 GHz band (1990-2025 GHz and 2165-2200 GHz). The Notice indicates that both

applicants have requested feeder link spectrum in the Ka-band frequencies to operate in conjunction with their 2 GHz systems.

The Notice does not, however, specifically limit any comments on the GlobalStar or Iridium 2 GHz applications to issues in the Ka-band frequencies, *i.e.*, requests for feeder link spectrum in the Ka-band frequencies, raised by those applications. It is ICO's understanding from the staff of the International Bureau, that it was the Commission's intent at this time to limit comments on the GlobalStar and Iridium 2 GHz applications to the feeder link portions of those applications in the Ka-band frequencies. ICO does not intend to comment on GlobalStar's or Iridium's proposed feeder links in the Ka-band frequencies. ICO reserves its right, however, to comment fully on the balance of both of those applications when they are placed on public notice along with the other applications and letters of intent filed in the first 2 GHz processing round. ICO also reserves its right to comment fully on those applicants' requests for additional feeder link spectrum in other frequency bands.

Respectfully submitted,

By: \_\_\_\_\_

  
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December 22, 1997

## CERTIFICATE OF SERVICE

I, Kimberly E. Thomas, do hereby certify that the foregoing **COMMENTS OF ICO SERVICES LIMITED** has been furnished, via first class mail (except as otherwise noted), on this 22nd day of December, 1997, to the following:

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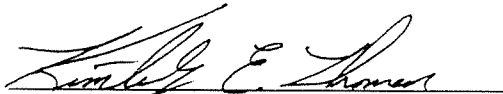
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