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December 22, 1997

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Federal Communications Commission
Office of Secretary
OF COUNSEL:
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Received

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Satellite Policy Branch
International Affairs

Via Hand Delivery

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: Iridium, LLC
File No. 187-SAT-P/L-97

Dear Ms. Salas:

KaStar Satellite Communications Corp., by its attorneys, hereby files an original and four copies of its comments with respect to the above-referenced application.

Please contact the undersigned directly if there are any questions concerning this matter.

Respectfully submitted,



David G. O'Neil

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Enclosures (5)

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Federal Communications Commission
Office of Secretary

In re)
)
IRIDIUM, LLC) File No. 187-SAT-P/LA-97
)
Application for Authority to)
Use MSS Feeder Links)

COMMENTS OF KASTAR SATELLITE
COMMUNICATIONS CORP.

KaStar Satellite Communications Corp. ("KaStar"), by its attorneys, hereby submits its comments on the above-referenced application of Iridium, LLC ("Iridium") for authority to use MSS feeder links in the Ka-band.¹ KaStar believes that Iridium's use of MSS feeder links may have the potential to cause interference to other Ka-band satellite systems. In particular, KaStar is concerned that operation of Iridium's proposed MSS feeder links may cause interference where GSO FSS networks, such as KaStar, have authority to operate on a co-primary basis with MSS feeder links. As a result, KaStar believes that the Commission require Iridium to coordinate with KaStar and the other GSO FSS systems when Iridium and any of the GSO FSS networks are ready to commence operation in order to ensure compliance with the 28 GHz Band Third Report and Order, FCC 97-378, released October 15, 1997 ("28 GHz Order").

¹ Pursuant to Order, DA 97-2496, released November 26, 1997, Comments regarding the above-referenced NGSO FSS system must be filed by December 22, 1997. Thus, these Comments are timely filed.


Iridium proposes to operate MSS feeder links in the 29.25-29.4 GHz band segment. GSO FSS systems and MSS feeder links are authorized to operate in this band segment on a co-primary basis. See 28 GHz Order at 18. Commission policies states that the system causing unacceptable interference has primary responsibility to mitigate interference, but that neither system would be required to disrupt or alter its transmissions. Id.

KaStar intends to use the 29.25-29.5 GHz band segment for gateway stations. KaStar believes that simultaneous operation of Iridium's MSS feeder links and KaStar's GSO FSS system may result in potential interference to both systems as well as other GSO FSS systems. KaStar believes that with proper coordination and mitigation techniques, such as satellite diversity and geographic separation of the ground stations, the potential for interference could be eliminated. To be effective, mitigation techniques require the cooperation of Iridium and KaStar, the effectiveness of which would be dependent upon the details of Iridium's system design. Iridium's application does not commit to site or satellite diversity. Coordination between Iridium and KaStar prior to the Iridium operating its MSS feeder links would minimize or avoid interference, thereby serving the public interest.

WHEREFORE, for the foregoing reasons, KaStar respectfully requests that the Commission require coordination between Iridium's proposed MSS feeder links and the GSO FSS systems, including KaStar, when both systems are ready to commence operation pursuant to the Commission's rules and regulations.

Respectfully submitted,

By:



Stephen E. Coran
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December 22, 1997

Its Attorneys

ENGINEERING CERTIFICATE

I hereby certify that I am the technically qualified person responsible for preparation of the engineering information contained in the attached "Comments of KaStar Satellite Communications Corp.," that I have either prepared or reviewed the engineering information contained in these comments, and that the technical information is true and correct to the best of my knowledge, information and belief.



T. J. McKnight
McKnight Associates Inc.
Luxembourg Corporate Center
409 Executive Drive
Langhorne, PA 19047

December 19, 1997

CERTIFICATE OF SERVICE

I, Victor Onyeoziri, with the law firm of Rini, Coran & Lancellotta, P.C., do hereby certify that the foregoing "Comments of KaStar Satellite Communications Corp." was served on the below-listed parties by first class U.S. mail postage prepaid this 22nd day of December, 1997.

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