

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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FEB 23 1998

In re )  
)  
MOTOROLA GLOBAL )  
COMMUNICATIONS, INC. )  
)  
Application for Authority to )  
Construct, Launch and Operate a )  
Non-Geostationary Fixed Satellite )  
Service System )  
)  
)  
IRIDIUM, LLC )  
)  
Application for Authority to )  
Use MSS Feeder Links )

File No. 79-SAT-P/LA-97(63)

Federal Communications Commission  
Office of Secretary

Received

FEB 26 1998

Satellite Policy Branch  
International Bureau

File No. 187-SAT-P/LA-97

To: Chief, International Bureau

**REPLY COMMENTS OF KASTAR SATELLITE  
COMMUNICATIONS CORP.**

KaStar Satellite Communications Corp. ("KaStar"), by its attorneys, hereby submits these Reply Comments concerning the above-referenced applications of Motorola Global Communications, Inc. ("Motorola") and Iridium, LLC ("Iridium") (collectively, the "Applicants").<sup>1</sup> KaStar is pleased that the Applicants acknowledge their obligation to coordinate their proposed satellite systems with Geostationary Orbit Fixed Satellite Service ("GSO FSS") Systems in the Ka-band. However, KaStar is concerned that the Applicants have not provided a meaningful method for coordination among Nongeostationary Orbit Fixed Satellite Service ("NGSO FSS") systems, MSS feeder links and GSO FSS systems.

KaStar is a new entrant to the satellite communications industry and has authority to

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<sup>1</sup> The Commission has established February 23, 1998 as the deadline for filing Reply Comments regarding the Applicants. See DA 98-21 at 2 (Int. Bur., released January 7, 1998). Thus, these Reply Comments are timely filed.

construct, launch and operate a GSO FSS system in the Ka-band.<sup>2</sup> As discussed in the comments it filed in this matter<sup>3</sup> KaStar is concerned that operation of either Applicant's proposed system in frequency bands in which GSO FSS systems have authority to operate on a primary or co-primary basis may cause unacceptable interference to GSO FSS systems. KaStar proposed possible solutions to this dilemma in its Comments, and requested submission of additional information by Motorola and coordination between the Applicants and NGSO FSS systems prior to the commencement of operations by either Applicant.

In its comments filed in this matter, Iridium agrees with KaStar that proper coordination and mitigation techniques, such as satellite diversity and geographic separation of ground stations, may help provide a workable sharing plan between MSS feeder links and GSO FSS systems. *See* Iridium Comments at 6. Iridium also reassures KaStar that it will coordinate with KaStar to avoid or at least minimize harmful interference. *See* Iridium Comments at 7. KaStar is pleased that Iridium is willing to cooperate in coordination proceedings. However, KaStar believes that it is important for coordination to occur sooner rather than later. Meaningful coordination will become exceedingly difficult, time consuming and expensive if conducted after both systems complete preliminary network plans.

Motorola also appears to be willing to coordinate its NGSO FSS system with GSO FSS systems. However, Motorola does not provide the information KaStar requested for KaStar to determine the potential interference emanating from Motorola's proposed system. This

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<sup>2</sup> *See KaStar Satellite Communications Corp.*, DA 97-972 (Int. Bur., released May 9, 1997).

<sup>3</sup> *See* Comments of KaStar Satellite Communications Corp. regarding Motorola Global Communications, Inc. (filed December 22, 1997) and Comments of KaStar Satellite Communications Corp. regarding Iridium, LLC (filed December 22, 1997) (hereinafter "Comments").

information is important for any meaningful coordination. Nor does Motorola provide KaStar with the necessary assurances that it would conduct this coordination prior to commencing operation. KaStar believes that it is important for coordination to occur when both systems have completed preliminary network plans.

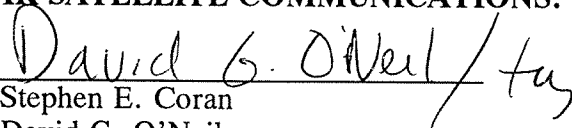
KaStar believes that coordination among NGSO FSS systems, GSO FSS systems and MSS feeder links is important as soon as possible. KaStar believes that informal working groups, consisting of the aforementioned satellite systems, working in tandem with the Commission, can provide meaningful standards for coordination that will minimize interference, prevent coordination disputes and provide for implementation of new service to the public in an efficient and timely manner. The alternative is chaos, disruptive service and continued litigation over sharing standards.

WHEREFORE, for the foregoing reasons, KaStar respectfully requests that the Commission require coordination between Iridium's proposed MSS feeder links, Motorola's NGSO FSS system and all GSO FSS systems, including KaStar, when the systems complete preliminary network plans.

Respectfully submitted,

**KASTAR SATELLITE COMMUNICATIONS. CORP.**

By:

  
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February 23, 1998

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**CERTIFICATE OF SERVICE**

I, Victor Onyeoziri, with the law firm of Rini, Coran & Lancellotta, P.C., do hereby certify that the foregoing "Reply Comments of KaStar Satellite Communications Corp." was served on the below-listed parties by first class U.S. mail postage prepaid this 23rd day of February, 1998.

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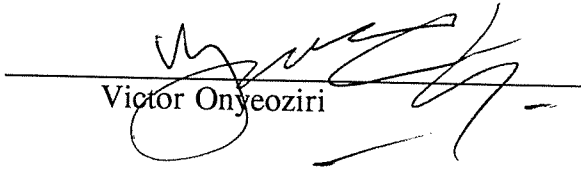
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