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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

In the matter of )  
)  
Application of Iridium, LLC. for Authority )  
to Construct, Launch, and Operate 96 Non- ) File No. 187-SAT-P/LA-97(96)  
geostationary Satellites )  
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COMMENTS OF BELL ATLANTIC

Bell Atlantic<sup>1</sup> hereby submits these comments on the application filed by Iridium, LLC ("Iridium") to provide voice and data service using ninety-six non-geostationary satellites. See FCC Public Notice, Report No. SPB-119 - File No. 187-SAT-P/LA-97(96) (March 19, 1998). The proposed Iridium system raises serious spectrum sharing issues that could have substantially harmful effects on existing and future fixed microwave operations. The Commission should defer action on the application until these fundamental spectrum sharing issues are resolved.

In its application, Iridium proposes to use frequencies between 19.3 GHz and 19.7 GHz ("the 18 GHz band") for downlink feeder transmissions from its satellite to earth stations located throughout the United States. The 18 GHz band is currently allocated to Fixed Microwave Service under Part 101 of the Commission's rules, and Bell Atlantic holds a substantial number of fixed microwave licenses in this band throughout its service

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<sup>1</sup> The Bell Atlantic companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-

area. Bell Atlantic is, therefore, concerned about the potential adverse effects of the Iridium proposal on the operations of its fixed microwave systems.

As the applicant, Iridium has the burden of demonstrating how potential interference from its proposal will be eliminated. Iridium's application is silent on the evaluation of the potential for interference between its proposed system and the existing terrestrial Point-to-Point systems. Frequency coordination is also required with respect to this proposal.

The problems with sharing spectrum among terrestrial and satellite services are not new. For example, the Commission recently concluded that co-frequency sharing between either geostationary or non-geostationary fixed satellite service and Local Multipoint Distribution Service ("LMDS") is not feasible. *Rulemaking to Amend Parts 1, 2, 21, 25 of the Commission's Rules to Redesignate The 27.5-29.5 GHz Frequency Band, To Reallocate the 29.5-30.0 GHz Frequency Band, To Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services*, 11 FCC Rcd 19005, ¶ 27 (1996). This conclusion was reached after considerable industry analysis and negotiations through the Commission's negotiated rulemaking process. In the end, the Commission could not resolve the co-frequency sharing problems and had to adopt a band segmentation plan to satisfy the needs of both industry segments.

Even if the Commission ultimately finds that the Iridium system can share spectrum with existing fixed microwave users, it must also consider the impact of the Iridium system on the future growth of microwave services. If the Commission were to

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West Virginia, Inc.; New York Telephone Company; New England Telephone and Telegraph Company and Bell Atlantic Mobile.

allow Iridium to operate in the 18 GHz band on a co-primary basis, the Commission would effectively foreclose this band from further fixed microwave use in areas where Iridium earth stations are sited.

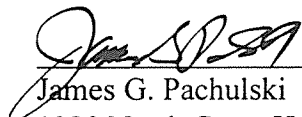
Iridium has clearly failed to meet its burden of proof and demonstrate that its proposed system can operate without causing unacceptable interference to existing and future fixed microwave systems. If the Commission nonetheless grants Iridium's application, the true magnitude of the interference problem may not be known until Iridium has spent billions of dollars to build, launch, and operate its system. At that point, the Commission will face the difficult decision of revoking Iridium's license or allowing the Iridium system to continue causing harmful interference to terrestrial microwave licensees. Given the increasing demand for fixed microwave services and the decreasing availability of other suitable bands, it is not in the public interest to grant Iridium's application without convincing proof that the two services can coexist.

CONCLUSION

The Commission should defer any action on Iridium's application until all questions concerning band sharing have been resolved.

Respectfully submitted,

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