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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Federal Communications Commission
Office of Secretary

In re Application of)
)
IRIDIUM LLC)
)
for Authority to Launch and Operate the)
Macrocell Mobile Satellite System)
in the 1990 to 2025 and 2165 to 2200 MHz)
Mobile Satellite Service Bands)

File No. 187-SAT-P/LA-97(96)

Received

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Satellite Policy Branch
International Bureau

To: CHIEF, INTERNATIONAL BUREAU

**ERRATUM TO CONSOLIDATED RESPONSE
AND OPPOSITION TO PETITION TO HOLD IN ABEYANCE**

On June 3, 1998, the undersigned filed a Consolidated Response and Opposition to Petition to Hold in Abeyance ("Consolidated Response") on behalf of Iridium LLC ("Iridium"). Attached are revised pages 9-11 of the Consolidated Response, which add a footnote (note 27) to the end of Section 4. B. which was inadvertently omitted from the version of the document filed with the Commission.

In addition, footnote 6 at page 4 of the pleading is hereby corrected by deleting the word "an" and substituting the word "a" in its place.

Respectfully submitted,

IRIDIUM LLC

By: 

Thomas J. Keller
Julian L. Shepard
Eric T. Werner
VERNER, LIIPFERT, BERNHARD,
McPHERSON, AND HAND, CHARTERED
901 - 15th Street, N.W., Suite 700
Washington, D.C. 20005-2301
(202) 371-6000

June 4, 1998

Counsel to Iridium, LLC

Macrocell application closed four months ago, on February 2, 1998.^{23/} Accordingly, the Commission should not entertain these extraordinarily late comments.

Bell Atlantic's concerns should also be rejected on their merits. It is clear that Bell Atlantic's interference concerns must be addressed through interservice coordination, and it is equally clear that such coordination can be successfully completed. As Iridium observed in the earlier feeder link phase of this proceeding, it "has committed in its Application to ensure that the MACROCELL system will comply with FCC rules regarding sharing and coordination in these frequency bands."^{24/} Indeed, feeder link coordination has already been successfully completed for the Iridium system,^{25/} and Iridium intends to proceed in similar fashion in the deployment of the Macrocell system.

B. Wireless Cable's Concerns Over Adjacent Channel Interference into 2 GHz Handsets

The Wireless Cable Association contends, without offering any specific technical details, that 2 GHz MSS handsets may encounter interference from MMDS

^{23/} See *In the Matter of SPB-105 (DA 97-2201), SPB-106 (DA 97-2202) (Order)*, DA 98-21, released January 7, 1998 (Granting requests by Iridium LLC and Motorola Global Communications, Inc., for extension of time to file reply comments and/or oppositions).

^{24/} Consolidated Opposition and Response, filed February 2, 1998, by Iridium LLC, at 5.

^{25/} See *U.S. Leo Services, Inc.*, 11 FCC Rcd 13962 (1996) (granting license to construct and operate transmit-receive gateway fixed Earth station facilities).

and ITFS operations in the adjacent bands.^{26/} This issue may be addressed in interservice coordination.^{27/}

C. Iridium's Proposal to Provide Services to the Aeronautical Market

ARINC and Constellation criticize that portion of Iridium's Application that proposes to provide aeronautical route services ("AMS(R)S").^{28/} Both of these commenters observe that, at present, neither an allocation nor the appropriate priority and preemption protections have been established to permit operation of AMS(R)S services within the 2 GHz band. Indeed, Iridium made these very points in its Comments concerning Boeing's application.^{29/}

In its Application, Iridium did state that "[t]he MACROCELL system will also include priority preemptive capabilities designed to be consistent with the requirements for the Global Maritime Distress and Safety System (GMDSS) and the Aeronautical Mobile Satellite (Route) Service (AMS(R)S)."^{30/} However, the Application makes clear that such capabilities are proposed as one aspect of a comprehensive package of MSS services to be provided by the Macrocell system. Iridium recognizes the present limitations on AMS(R)S service in the 2 GHz band and does not believe that its current technical proposal requires a specific allocation. Should Iridium intend to offer AMS(R)S, Iridium recognizes that it would need an appropriate allocation to

^{26/} WCAI Comments at 3.

^{27/} See, e.g., 47 C.F.R. §§ 74.936(b), 74.950; see also *id.* § 21.908.

^{28/} See ARINC Comments at 1 n.1; Constellation Comments at 24.

^{29/} See Iridium Comments at 7-9.

^{30/} Iridium Application at 13 (emphasis added).

permit it. Unlike Boeing's proposal, however, Iridium's Macrocell system would provide a wide array of MSS services currently authorized for the 2 GHz band.

D. Iridium's Proposal to Employ CDMA and TDMA Signal Coding Techniques

Several commenters question Iridium's proposal to employ both CDMA and TDMA signal coding protocols.^{31/} Iridium recognizes the technical incompatibility of these two protocols if used simultaneously within the same frequency band. Iridium has no intention to so employ them. Rather, Iridium's proposal contemplates use of each protocol within discrete sub-bands to support specific types of services: TDMA to support Iridium's voice communications services, and CDMA to support a variety of variable rate data transmissions.

V. CONCLUSION

In its Macrocell application, Iridium provided all of the information required by the Commission's *2 GHz MSS Allocation Order* and the relevant public notices soliciting the filing of MSS applications to operate in the 2 GHz band. Iridium has proposed a global system that will enhance competition in the global MSS market and contribute to the expansion in MSS capacity which will be necessary to satisfy projected demand levels in the future.

As demonstrated in the Application, and again herein, Iridium is fully qualified to construct, launch, and operate its proposed system. Accordingly, for the reasons set forth herein, the Commission should reject the arguments of the

^{31/} See Boeing Petition at 10; ICO Comments at 15-16; Constellation Comments at 24-25.

CERTIFICATE OF SERVICE

I, Bridget Y. Monroe, a secretary for the law firm of Verner, Liipfert, Bernhard, McPherson, and Hand, Chartered, hereby certify that this fourth (4th) day of June, 1998, I caused a copy of the foregoing "Erratum to Consolidated Response and Opposition to Petition to Hold in Abeyance" to be sent, by first class United States Mail, postage prepaid (* or by hand delivery), to each of the following:

The Honorable William E. Kennard*
Chairman
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Room 814
Washington, D.C. 20554

Christopher J. Wright, Esquire*
General Counsel
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Room 614
Washington, D.C. 20554

The Honorable Harold Furchtgott-Roth*
Commissioner
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Room 802
Washington, D.C. 20554

Regina Keeney*
Chief, International Bureau
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 830
Washington, D.C. 20554

The Honorable Michael Powell*
Commissioner
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Room 844
Washington, D.C. 20554

James L. Ball*
Associate Bureau Chief
International Bureau
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 820
Washington, D.C. 20554

The Honorable Susan Ness*
Commissioner
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Room 832
Washington, D.C. 20554

Mindy Ginsburg*
Associate Bureau Chief
International Bureau
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 8180
Washington, D.C. 20554

The Honorable Gloria Tristani*
Commissioner
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Room 826
Washington, D.C. 20554

Rebecca Arbogast*
Senior Legal Advisor
International Bureau
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 800
Washington, D.C. 20554

Thomas S. Tycz*
Chief, Satellite and
Radiocommunications Division
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 811
Washington, D.C. 20554

Cecily Holiday*
Deputy Chief, Satellite and
Radiocommunications Division
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 520
Washington, D.C. 20554

Cassandra Thomas*
Deputy Chief, Satellite and
Radiocommunication Division
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 810
Washington, D.C. 20554

Fern Jarmulnek*
Chief, Satellite Policy Branch
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 518
Washington, D.C. 20554

Rosalee Chiara*
Deputy Chief, Satellite Policy Branch
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 516
Washington, D.C. 20554

Linda Haller*
Senior Legal Advisor
Satellite Policy Branch
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 800
Washington, D.C. 20554

John Martin*
Electronics Engineer
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 507
Washington, D.C. 20554

Damon Ladson*
Deputy Chief, Planning and
Negotiations Division
FEDERAL COMMUNICATIONS COMMISSION
2000 M Street, N.W.
Room 521
Washington, D.C. 20554

Warren Grace
Director General
INMARSAT
99 City Road
London EC1Y 1AX
United Kingdom

Antoinette Cook Bush, Esquire
John C. Quale, Esquire
SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111
Counsel for Celsat America, Inc.

Robert A. Mazer, Esquire
Albert Shuldiner, Esquire
VINSON & ELKINS, L.L.P.
1455 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-1008
*Counsel for Constellation
Communications, Inc.*

Joseph P. Markoski, Esquire
Herbert E. Marks, Esquire
David A. Nall, Esquire
Bruce A. Olcott, Esquire
SQUIRE, SANDERS & DEMPSEY L.L.P.
P.O. Box 407
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20044-0407
Counsel for The Boeing Company

Peter D. Sloane, Esquire
Office of the Group Counsel
Information, Space & Defense
Systems Group
The Boeing Company
P.O. Box 3999, M/S 84-10
Seattle, WA 98124-2499

Gregory C. Staple, Esquire
KOTEEN & NAFTALIN, L.L.P.
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036
*Counsel for TMI Communications and
Company, Limited Partnership*

William D. Wallace, Esquire
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Counsel for Globalstar, L.P.

Robert E. Conn, Esquire
SHAW, PITTMAN, POTTS & TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20037
*Counsel for Mobile Communications
Holdings, Inc.*

Cheryl A. Tritt, Esquire
Charles H. Kennedy, Esquire
Sheryl J. Lincoln, Esquire
MORRISON & FOERSTER, LLP
2000 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-1886
Counsel for ICO Services Limited

Francis D.R. Coleman
Director Regulatory Affairs - North
America
ICO GLOBAL COMMUNICATIONS
1101 Connecticut Avenue, N.W.
Suite 550
Washington, D.C. 20036

*INTERNATIONAL TRANSCRIPTION SERVICE
2100 M Street, N.W.
Suite 140
Washington, D.C. 20037

John L. Bartlett, Esquire
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.C. 20006-2304
Counsel for Aeronautical Radio, Inc.

James G. Pachulski, Esquire
1320 North Court House Road
Eighth Floor
Arlington, VA 22201
Counsel for Bell Atlantic

Nils Rydbeck
Vice President Research &
Development
Chief Technical Officer
ERICSSON MOBILE PHONES &
TERMINALS
7001 Development Drive
Research Triangle Park, NC 27709

Denis Couillard, Chairman
Eric Schimmel, Vice President
TELECOMMUNICATIONS INDUSTRY
ASSOCIATION
2500 Wilson Boulevard
Suite 300
Arlington, VA 22201

Leonard R. Raish, Esquire
FLETCHER, HEALD & HILDRETH, P.L.C.
11th Floor
1300 N. 17th Street
Rosslyn, VA 22209
*Counsel for Telecommunications
Industry Association*

Robert J. Miller, Esquire
Emily S. Barbour, Esquire
GARDERE & WYNNE, L.L.P.
1601 Elm Street
Suite 3000
Dallas, TX 75201
*Counsel Telecommunications
Industry Association*

Peter A. Rohrbach, Esquire
Karis A. Hastings, Esquire
HOGAN & HARTSON L.L.P.
555 Thirteenth Street, N.W.
Washington, D.C. 20004
*Counsel for GE American
Communications, Inc.*

Philip V. Otero, Esquire
Senior Vice President and
General Counsel
GE AMERICAN COMMUNICATIONS, INC.
Four Research Way
Princeton, NJ 08540

John P. Janka, Esquire
LATHAM & WATKINS
1001 Pennsylvania Avenue, N.W.
Suite 1300
Washington, D.C. 20004-2505
*Counsel for Hughes Communications
Galaxy, Inc.*

Gary M. Epstein, Esquire
John P. Janka, Esquire
James H. Barker, Esquire
LATHAM & WATKINS
1001 Pennsylvania Avenue, N.W.
Suite 1300
Washington, D.C. 20004
*Counsel for Hughes Electronics
Corporation*

Gerald Musarra
Senior Director, Commercial Policy
& Regulatory Affairs
Space & Strategic Missiles Sector
LOCKHEED MARTIN CORPORATION
1725 Jefferson Davis Highway
Suite 403
Arlington, VA 22202-4127

Raymond G. Bender, Esquire
Carlos M. Nalda, Esquire
DOW, LOHNES & ALBERTSON, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036
*Counsel for Lockheed Martin
Corporation*

Jill Abeshouse Stern, Esquire
Sr. Vice President and General
Counsel
Gerald B. Helman, Esquire
Vice President, International and
Governmental Affairs
MOBILE COMMUNICATIONS HOLDINGS, INC.
Two Lafayette Center
1133 Twenty-first Street, N.W.
Washington, D.C. 20036

Philip L. Spector, Esquire
Jeffrey H. Olson, Esquire
Patrick S. Campbell, Esquire
Kira A. Merski, Esquire
PAUL, WEISS, RIFKIND, WHARTON
& GARRISON
1615 L Street, N.W.
Suite 1300
Washington, D.C. 20036
*Counsel for Mobile Communications
Holdings, Inc.*

Philip L. Spector, Esquire
Jeffrey H. Olson, Esquire
Diane C. Gaylor
PAUL, WEISS, RIFKIND, WHARTON
& GARRISON
1615 L Street, N.W.
Suite 1300
Washington, D.C. 20036
Counsel for Skybridge L.L.C.

Mark A. Grannis, Esquire
HARRIS, WILTSHIRE & GRANNIS LLP
1200 Eighteenth Street, N.W.
Washington, D.C. 20036
*Counsel for North American GSM
Alliance LLC & Teledesic LLC*

Henry Goldberg, Esquire
Joseph A. Godles, Esquire
Mary J. Dent, Esquire
W. Kenneth Ferree, Esquire
GOLDBERG, GODLES, WIENER & WRIGHT
1229 Nineteenth Street, N.W.
Washington, D.C. 20036
Counsel for PanAmSat Corporation

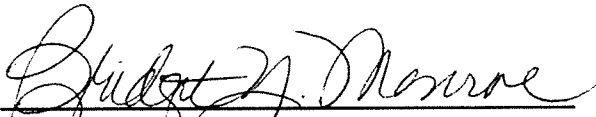
Benjamin J. Griffin, Esquire
REED, SMITH, SHAW & McCLAY
1301 K Street, N.W., East Tower
Suite 1100
Washington, D.C. 20005
Counsel for Primestar Partners, L.P.

Marvin Rosenberg, Esquire
HOLLAND & KNIGHT
2100 Pennsylvania Avenue, N.W.
Suite 400
Washington, D.C. 20037
*Counsel for United States Satellite
Broadcasting Company, Inc.*

Karen E. Watson, Esquire
Director, Government Relations
ECHOSTAR COMMUNICATIONS
CORPORATION
1850 M Street, N.W.
Suite 1070
Washington, D.C. 20036

Paul J. Sinderbrand, Esquire
William W. Huber, Esquire
WILKINSON, BARKER, KNAUER
& QUINN, LLP
2300 N Street, N.W.
Washington, D.C. 20037-1128
*Counsel for The Wireless Cable
Association International, Inc.*

June 4, 1998


Bridget Y. Monroe