

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

DUPLICATE
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JUN - 3 1998

In the Matter of the Applications of)
)
The Boeing Company) File No. 179-SAT-P/LA-97(16)
) 90-SAT-AMEND-98
)
Celsat, Inc. and Celsat) File No. 26/27/28-DSS-P/LA-97
America, Inc.) 88-SAT-AMEND-98
)
Constellation Communications, Inc.) File No. 181-SAT-P/LA-97(46)
)
Globalstar, L.P.) File Nos. 182-SAT-P/LA-97(64)
) 183-186-SAT-P/LA-97
)
ICO Services Limited) File No. 188-SAT-LOI-97
)
Inmarsat Horizons) File No. 190-SAT-LOI-97(4)
)
Iridium, L.L.C.) File No. 187-SAT-P/LA-97(96)
)
Mobile Communications Holdings, Inc.) File No. 180-SAT-P/LA-97(26)
)
TMI Communications and Company,) File No. 189-SAT-LOI-97
Limited Partnership)

REPLY COMMENTS OF AMSC SUBSIDIARY CORPORATION

AMSC Subsidiary Corporation ("AMSC") hereby submits this reply to the Consolidated Comments of ICO Services Limited ("ICO Comments") in connection with the above-referenced proceedings to license Mobile Satellite Service ("MSS") in the 2 GHz band. ICO contends that there is sufficient spectrum in the MSS L-band to license certain of the 2 GHz applicants in those frequencies, in which AMSC's existing U.S. MSS system is operating, rather than in the 2 GHz band. As discussed briefly below, this contention is inaccurate.^{1/}

^{1/} In response to the comments filed by Constellation Communications, Inc., AMSC
(continued...)

The MSS L-band is already extremely congested. In the North American region, AMSC faces coordination with Inmarsat and Canadian, Mexican, Russian, and (recently) Japanese systems. Together, these systems operate or propose to operate nearly twenty satellites, many of which have footprints that cover substantial amounts of United States territory. In other regions, there are many more systems being coordinated. International coordination of these frequencies has been difficult, because the aggregate demand of the different systems far exceeds the current supply of L-band spectrum.

ICO mistakenly asserts that AMSC's agreement to buy half of TMI's MSAT-1 and to relocate its own satellite under a lease arrangement to serve sub-Saharan Africa has "free[d] up" spectrum in the L-Band for use by 2 GHz band MSS applicants. ICO Comments at 20. When these transactions occur, they will not eliminate the spectrum shortage in the MSS L-band. AMSC continues to have sufficient capacity and hold a license that permits it to use more spectrum than it has been able to access pursuant to international frequency coordination. In addition, AMSC's proposed consolidation of space segment is only temporary, and AMSC plans to launch a second-generation satellite to operate in the same spectrum as AMSC's first-generation system. Furthermore, as other, foreign-licensed systems continue to grow, their own spectrum demands are likely to increase.

¹ (...continued)
clarifies that its subsidiary, Personal Communications Satellite Corporation, is no longer pursuing a 2 GHz authorization. AMSC plans shortly to file an application to launch and operate its second-generation MSS system to operate on the frequencies already assigned to AMSC, in the L-band. This second-generation MSS system will enable AMSC to provide expanded capacity, support existing users, and improve coverage.

Conclusion

Based on the foregoing, AMSC urges the Commission to reject any proposals to add more MSS systems to the L-band.

Respectfully submitted,

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June 3, 1998

CERTIFICATE OF SERVICE

I, Elinor W. McCormick, a secretary to the law firm of Fisher Wayland Cooper Leader & Zaragoza L.L.P., hereby certify that on this 3rd day of June 1998, I served a true copy of the foregoing **“REPLY COMMENTS OF AMSC SUBSIDIARY CORPORATION”** by first class United States Mail, postage prepaid, upon the following:

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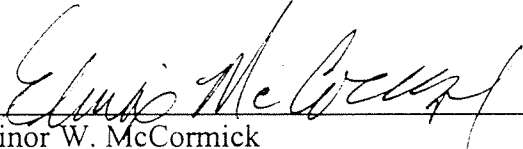
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