

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

In the Matter of)	
)	
Application of Astro Digital U.S., Inc. for)	File No. SAT-LOA-20170508-00071
Authority to Launch and Operate a Non-)	
Geostationary Satellite Orbit System in)	
the Earth-Exploration Satellite Service)	
)	

COMMENTS OF IRIDIUM CONSTELLATION LLC

In the above-captioned Application, Astro Digital U.S., Inc. (“Astro Digital”) seeks a license for a new planned non-geostationary satellite orbit (“NGSO”) satellite system in the Earth-Exploration Satellite Service. Among other things, Astro Digital proposes to operate intersatellite links between its satellites and the Globalstar system using frequencies in the Big LEO band between 1615 MHz and 1617.775 MHz.

Astro Digital’s proposal has interference implications for Iridium Constellation LLC (“Iridium”), which operates a 66 satellite NGSO system in low earth orbit.¹ The service links for Iridium’s constellation are in the 1617.775-1626.5 MHz part of the Big LEO band, which is adjacent to the band Astro Digital proposes to use.² Iridium shares 1617.775-1618.725 MHz with Globalstar and has an exclusive license for 1618.725-1626.5 MHz.³

¹ See, e.g., *Application of Iridium Constellation LLC for Modification of License to Authorize a Second-Generation NGSO MSS Constellation*, Order and Authorization, 31 FCC Rcd 8675 (IB 2016).

² *Id.* at 3.

³ *Id.* at n. 9.

Astro Digital seeks a waiver to operate its intersatellite links in the Big LEO band.⁴ But the only interference scenario addressed in Astro Digital's waiver request is "the potential for interference to terrestrial stations operating in the same or adjacent frequency bands."⁵ Astro Digital does not acknowledge that Iridium's satellites also operate in "the same or adjacent frequency bands," and it makes no attempt to analyze the potential for its intersatellite links to interfere with Iridium's service links.

Astro Digital's application, therefore, is incomplete. Astro Digital should be required to expand its interference analysis to include Iridium, and the Commission should take no action on Astro Digital's application until the expanded interference analysis has been submitted and Iridium has been given an opportunity to comment.

Respectfully submitted,

IRIDIUM CONSTELLATION LLC

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⁴ Application, Exhibit 43, p. 53.

⁵ *Id.*

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of September, 2017, a copy of the foregoing Comments of Iridium Constellation LLC was sent by first-class, United States mail to the following:

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/s/ _____
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