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Jose Albuquerque
Chief, Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: File No. SAT-LOA-20170508-00071

Dear Mr. Albuquerque:

The International Bureau previously granted in part the above-referenced Application of Astro Digital U.S., Inc. ("Astro Digital"). The Grant includes authority to operate an intersatellite link ("ISL") between Astro Digital's system and the Globalstar system using frequencies in the Big LEO band between 1615 MHz and 1617.775 MHz.¹ This authority is limited to Astro Digital's initial satellite, and the Bureau deferred action on Astro Digital's request to operate such links on up to thirty satellites at a time.² For the reasons stated below, Iridium Constellation LLC ("Iridium") asks that certain issues be taken into account when the Bureau acts on the deferred portion of Astro Digital's Application.

Although Astro Digital's operation of ISLs in the 1615 -1617.775 MHz band is a non-conforming use, the Grant did not state explicitly, as ordinarily would be the case with a non-conforming use, that Astro Digital must not cause interference to Iridium's operations in the band and must accept interference from Iridium's operations in the band. And although the Bureau noted in its Grant that Iridium had raised concerns

¹ See Stamp Grant, Dec. 14, 2017, as modified on Apr. 12, 2018, SAT-LOA-20170508-00071, Call Sign S3014 (the "Grant").

² Grant at n.1.

with potential interference to Iridium's satellites, it appears to have overlooked a response Iridium had filed.³ The Grant makes no mention of Iridium's Response and does not address the following points presented therein:

- Astro Digital's proposal should be deferred pending the outcome of a rulemaking to examine the use of ISLs in non-ISL bands⁴; and
- if processing is not deferred, then:
 - Astro Digital should be required to present evidence to support the claim its modems will suppress OOB by at least 24 dB more than specified in the applicable ITU recommendation (the Bureau appears to have relied on this claim in the Grant⁵); and
 - Astro Digital should have to cease operations in the Big LEO band above 1616 MHz during periods when Iridium is operating in that part of the band pursuant to an STA.

Iridium asks that the non-conforming status of Astro Digital's ISLs in the 1615 - 1617.775 MHz band and the issues addressed in Iridium's Response be taken into account by the Bureau before acting on the deferred portion of Astro Digital's Application.

Respectfully submitted,

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cc: Tony Lin, counsel for Astro Digital

³ See Letter dated Nov. 21, 2017 from Maureen C. McLaughlin, Vice President, Public Policy and Joseph A. Godles, Attorney for Iridium Constellation LLC to Mr. Jose P. Albuquerque, Chief, Satellite Division re File No. SAT-LOA-20170508-00071 ("Iridium's Response").

⁴ The Commission subsequently initiated a rulemaking proceeding in which it is seeking comment on this very issue. See Notice of Proposed Rulemaking, IB Docket No. 18-86, FCC 18-44 (Apr. 17, 2018), at ¶¶ 70-73.

⁵ See Grant at n. 3.