



International Bureau

Federal Communications Commission
Washington, DC 20554

July 25, 2005

VIA E-MAIL AND U.S. MAIL

Michael R. Deutschman, Esq.
Chief Counsel and Chief Administrative Officer
Iridium Satellite LLC
6701 Democracy Boulevard
Suite 500
Bethesda, MD 20817

Re: Application for Authority to Provide Aeronautical Mobile-Satellite (Route) Service Over the IRIDIUM System, File Nos. SAT-MOD-19961204-00139 and 18-SAT-ML-97

Dear Mr. Deutschman:

The purpose of this letter is to solicit additional information that may have a material bearing on disposition of the referenced application which was originally filed in December 1996 and was amended in 2002 to substitute Iridium Satellite LLC as the party in interest.¹

The application requests modification of the Iridium space-station license to add authority for provision of "AMS(R)S," specifically defined for purposes of the application as referring only to Air Traffic Service ("ATS") and Aeronautical Operational Control ("AOC") communications.² The application acknowledges that at the time of its filing neither the Federal Aviation Administration ("FAA") nor the International Civil Aviation Organization ("ICAO") had established performance standards for provision of ATS and AOC via non-geostationary-orbit ("NGSO") satellites.³ In September 2004, the FAA adopted a Technical Standard Order specifying minimum performance standards for AMS(R)S aircraft earth stations used with "Next Generation Satellite Systems," which applies by its terms to equipment used either with GSO or NGSO systems.⁴ In public comments filed earlier in the same month, however, the NTIA urged

¹ See letter to the FCC Secretary dated April 9, 2002 from Philip L. Malet, Counsel for Space System License, Inc. and Michael R. Deutschman, Chief Counsel and Chief Administrative Officer, Iridium Satellite LLC.

² Application for Minor License Modification, SAT-MOD-19961204-00139, Appendix 1, n.2. The application requests modification of the Iridium Big LEO space-station license to include authority for AMS(R)S operation.

³ *Id.* at 3 and Appendix 1 at 2 and 7-9.

⁴ See Minimum Operational Performance Standards for Avionics Supporting Next Generation Satellite Systems, RTCA/DO-262 (Dec. 14, 2000) at 1.3.1.4, and FAA TSO-C159, Avionics Supporting Next Generation Satellite Systems (NGSS) (Sept. 20, 2004), incorporating RTCA/DO-262 by reference.

the Commission to refrain from amending Part 87 of its rules to provide for licensing of AMS(R)S terminals for use with NGSO systems unless ICAO adopts Standards and Recommended Practices ("SARPS") for provision of AMS(R)S via such systems.⁵ The NTIA also argued that the Commission should refrain from amending Part 87 to provide for licensing AMS(R)S terminals for operation in the 1610-1626.5 MHz band prior to adoption of AMS(R)S SARPS specifically applicable to operation in that band.⁶

In order to facilitate processing of the Iridium AMS(R)S application, please provide the Commission with the following information by August 9, 2005:

1. Is it technically feasible for AMS(R)S to be provided via the currently-operating Iridium satellites in compliance both with the minimum performance standards incorporated by reference in TSO-C159 and the requirements of pertinent coordination agreements pertaining to protection of radio astronomy observation?

2. What is the current status of ICAO proceedings concerning possible adoption of SARPs for provision of AMS(R)S in the 1610-1626.5 MHz band via NGSO satellites? Is there any reason to assume or conclude at this time that it is, or will be, technically and economically feasible to implement AMS(R)S via current-generation Iridium satellites in conformance with pertinent ICAO SARPs?

3. Please confirm that the application on file with the Commission accurately reflects Iridium Satellite LLC's current business plans and all materially-relevant facts at the present time.⁷ If the application does not accurately reflect the current situation, an amendment must be filed by August 9, 2005.

4. Please explain how the proposed AMS(R)S operation would meet the requirement in 47 CFR § 25.213(a)(3) to "take whatever steps [are] necessary" to avoid harmful interference with observation at certain identified radio astronomy sites and explain how such AMS(R)S operation could be coordinated with licensed operation of the Globalstar Big LEO system in the 1610-1621.35 MHz band.⁸

⁵ Comments of the National Telecommunications and Information Administration in WT Docket No. 01-289 (Sept. 13, 2004).

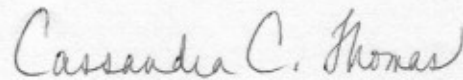
⁶ *Id.* at 7.

⁷ See 47 CFR § 1.65(a).

⁸ In this regard, we note that the frequencies assigned for Iridium service-link transmission in both directions are allocated for MSS downlink operation only on a secondary basis. See 47 CFR § 2.106.

Please file the information requested in this letter by the date specified above and provide hand-delivered or electronic courtesy copies to Robert Nelson (Robert.Nelson@fcc.gov) and William Bell (William.Bell@fcc.gov). If the information is not provided within the time afforded for response, the application may be dismissed pursuant to Sections 25.112(c) and 25.152(b) of the Commission's rules.⁹

Sincerely,



Cassandra C. Thomas
Acting Chief
Satellite Division

⁹ Also see *Amendment of the Commission's Space Station Licensing Rules and Policies* (First Report and Order), FCC 03-102, 18 FCC Rcd 10760 (2003), at ¶244.