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

Federal Communications Commission
Office of the Secretary

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Domestic Facilities Division
Satellite Radio Branch

File No. 10-DSS-MISC-90

In the Matter of)
)
American Mobile Satellite)
Corporation Request for Waiver)
of Table of Allocations)

COMMENTS

Communications Satellite Corporation ("COMSAT"), as the U.S. Signatory to the International Maritime Satellite Organization ("INMARSAT"), hereby submits comments on the "Request for Waiver" filed by the American Mobile Satellite Corporation ("AMSC") on December 18, 1989. AMSC asks the Commission to waive the Table of Allocations, Section 2.106 of the Commission's Rules, so that it can provide on a temporary basis via COMSAT's INMARSAT facilities, its domestic mobile satellite services in all of the internationally allocated Maritime Mobile Satellite Service ("MMSS") bands. For the reasons stated below, COMSAT supports in part and opposes in part the waiver of AMSC as currently drafted.

AMSC's waiver request is very broad and goes far beyond the needs of AMSC's lease arrangements with COMSAT for INMARSAT capacity.^{1/}

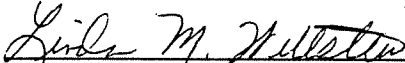
^{1/} See Agreement Between Communications Satellite Corporation and American Mobile Satellite Corporation for Domestic Mobile Satellite Service, filed August 11, 1989, amendment filed September 26, 1989.

Further, AMSC does not currently specify or justify a particular use requirement in the full MMSS bands.

AMSC's lease agreement with COMSAT for INMARSAT capacity is limited to the temporary use of the L-band frequencies for MARISAT operation at 1537-1541 MHz (downlink) and 1638.5-1642.5 MHz (uplink). AMSC is requesting a waiver to use capacity far in excess of its authorized service and system needs -- to utilize the full internationally allocated maritime mobile satellite bands, 1530-1544 MHz (downlink) and 1626.5-1645.5 MHz (uplink). Although AMSC may contract with COMSAT for more INMARSAT capacity in the future, AMSC's current waiver should be limited to those services which it has actually contracted with COMSAT to use via INMARSAT in the MMSS bands. An overbroad waiver is not justified. The Commission should not grant such a waiver without good cause or a public interest showing.

In view of the foregoing, COMSAT requests that the Commission not grant AMSC's waiver request beyond those frequencies which have been specifically contracted for by AMSC on a temporary basis, the 1537-1541 MHz (downlink) and 1638.5-1642.5 MHz (uplink) bands.

Respectfully submitted,
COMMUNICATIONS SATELLITE CORPORATION
World Systems Division



Linda M. Wellstein

950 L'Enfant Plaza, S.W.
Washington, D.C. 20024
(202) 863-6018
Its Attorney

January 29, 1990

CERTIFICATE OF SERVICE

I, Deborah Lee, do hereby certify that a copy of the foregoing "Comments" was served by hand, this 29th day of January, 1990, on each of the following:

Wendell R. Harris
Assistant Bureau Chief/International
Federal Communications Commission
Common Carrier Bureau
1919 M Street, N.W.
Room 534
Washington, D.C. 20554

Mr. George Li
Acting Chief, International Facilities
Federal Communication Commission
1919 M Street N.W., Room 534
Washington, D.C. 20554

Mr. Jim Ball
Deputy Assistant Bureau Chief,
International Facilities
Federal Communications Commission
1919 M Street N.W., Room 530
Washington, D.C. 20554

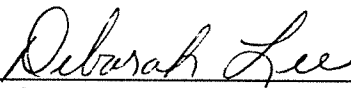
Mr. Gerald Vaughan
Federal Communications Commission
1919 M Street N.W., Room 500
Washington, D.C. 20554

Ms. Cecily Holiday
Federal Communications Commission
2025 M Street, N.W., Room 6324
Washington, D.C. 20554

Mr. Thomas Tycz
Federal Communications Commission
2025 M Street, N.W., Room 6010
Washington, D.C. 20554

Mr. George Tellmann
American Mobile Satellite Corp.
1233 20th Street, N.W.
Washington, D.C. 20036

Mr. Lon Levin
American Mobile Satellite Corp.
1233 20th Street, N.W.
Washington, D.C. 20036



Deborah Lee