

BEFORE THE

# Federal Communications Commission

WASHINGTON, D.C. 20554

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MAY 23 1990

In the Matter of the Application of )  
 STARSYS, INC. )  
 For Authority to )  
 Construct a Low Earth Orbit Mobile )  
 Satellite System )

Domestic Facilities Division  
 Satellite Radio Branch  
 File No. 36-DSS-MISC-90

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REQUEST FOR WAIVER OF  
 SECTION 319(d) OF THE COMMUNICATIONS ACT

STARSYS, Inc. ("STARSYS"), by its attorneys and  
 pursuant to Section 319(d) of the Communications Act of 1934,  
 as amended, 47 U.S.C. § 319(d), hereby requests a waiver of the  
 requirement that STARSYS obtain a construction permit before it  
 commences construction of its proposed "STARNET" low earth  
 orbit mobile satellite system. Concurrently with this waiver  
 request, STARSYS is also filing an application for authority to  
 construct its proposed STARNET system. Pending the  
 Commission's decision with respect to the application, STARSYS  
 is willing and prepared to assume the risk involved in  
 commencing the construction process. In support of this waiver  
 request, the following is shown.

By allowing STARSYS immediately to begin design,  
 pre-construction, and limited construction of its STARNET  
 system, a Section 319(d) waiver would permit it more

expeditiously to provide the American public with a wide array of beneficial services, including the following:

- two-way messaging from ultra-low-cost calculator-size terminals;
- position determination anywhere in the world;
- emergency alert services, for safety of life or property;
- environmental monitoring services, to reduce pollution;
- mobile property management services, for anti-theft purposes;
- automatic vehicle pollutant emission level monitoring;
- electronic license plate functions for intelligent vehicle-highway systems; and
- biosensor monitoring for telemedicine applications.

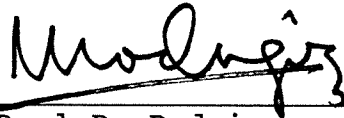
STARSYS and its affiliates have more experience than any other entity in the world in designing, constructing, and operating low earth orbit mobile satellite payloads. Now, STARSYS is prepared to bring these services to the public through a spectrally-efficient commercial low earth orbit satellite system that capitalizes both on the experience of STARSYS's affiliates and on advances in the state of technology. A waiver of the Section 319(d) construction permit requirement will enable STARSYS to commence system construction at its own risk, and thereby advance the date when the STARNET

system enters into service. As such, the public interest will be well served by the grant of this request.

Therefore, for the reasons stated above, STARSYS should be granted a waiver pursuant to Section 319(d) of the Communications Act.

Respectfully submitted,  
STARSYS, INC.

By:



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May 4, 1990

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