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JUL 16 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY  
July 16, 1996

Received

JUL 26 1996

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International Bureau

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Hon. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

148-SAF-MISC-96

Re: NATSAT Application for 1.6/2.4 GHz Mobile Satellite Service Authority

Dear Mr. Caton:

Yesterday, National Telecom Satellite Communications Services, Inc. ("NATSAT"), filed an application for Authority to Provide U.S. Domestic Land and Aeronautical 1.6/2.4 GHz Mobile Satellite Services with the Commission's lockbox office in Pittsburgh, Pennsylvania. Due to a delay in overnight delivery, the original of this application and associated FCC Form 430 were not included with the application as filed. We have enclosed for the Commission's records the original documents. We regret any inconvenience this may have caused.

If you have any questions, please contact undersigned counsel directly.

Sincerely,



David A. LaFuria

Enclosures

original

**RECEIVED**

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

**JUL 16 1996**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

\_\_\_\_\_  
In re Application of \_\_\_\_\_ )  
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 )  
 )  
**NATIONAL TELECOM SATELLITE** )  
**COMMUNICATIONS, INC.** )  
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 )  
For Authority to Provide U.S. Domestic )  
Land and Aeronautical 1.6/2.4 GHz )  
Mobile Satellite Services ("MSS") )  
\_\_\_\_\_ )

Received

JUL 26 1996

FCC File No. \_\_\_\_\_

Satellite Policy Branch  
International Bureau

To: Chief, Satellite and Radiocommunication Division  
International Bureau

**APPLICATION**

National Telecom Satellite Communications, Inc. ("NATSAT"), pursuant to Part 25 of the Commission's Rules and the Communications Act of 1934, as amended (the "Communications Act"), hereby submits its application for authority to use space segment, space stations and earth stations of any and all "Big LEO"<sup>1</sup> providers, foreign and domestic ("Big LEO Providers"), to provide U.S. domestic land mobile and aeronautical MSS, using Big LEO satellites and related infrastructure covering the Atlantic and Pacific Ocean Regions.

<sup>1</sup> The term refers to low-Earth orbit ("LEO") mobile satellite service ("MSS") systems operating in frequencies above 1 GHz. As used in this Application, it refers specifically to LEO MSS in the 1.6/2.4 GHz frequency bands.

NATSAT seeks authority to use space segment, space stations and earth stations (collectively, "Big LEO Infrastructure") of Big LEO Providers including, but not limited to, Motorola Satellite Communications, Inc. ("Motorola"); TRW, Inc. ("TRW"); Loral/QUALCOMM Partnership, L.P. ("LQP"); AMSC Subsidiary Corporation ("AMSC"); Constellation Communications, Inc. ("Constellation"); Mobile Communications Holdings, Inc. ("MCHI"); and COMSAT Corporation ("COMSAT").<sup>2</sup>

NATSAT seeks this authority so that it can quickly offer readily affordable next-generation MSS to the American public.

## **I. BACKGROUND**

With this Application, NATSAT, a minority-owned small business, proposes to use Big LEO Infrastructure to provide domestic land mobile and aeronautical MSS covering the continental United States, Alaska, Hawaii, Puerto Rico, U.S. Virgin Islands, Guam, Northern Mariana Islands and American Samoa, as well as their respective coastal waters. NATSAT plans to offer a wide range of satellite-delivered mobile personal communications services including, but not limited to, telephone, data, fax, and position-reporting services to individuals as well as governmental entities and businesses in the transportation, land mobile, maritime, aeronautical, disaster management, search and rescue, environmental monitoring, and fixed site markets.

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<sup>2</sup> In the case of COMSAT, NATSAT would be utilizing the Big LEO Infrastructure of the International Mobile Satellite Organization ("INMARSAT"), as provided to NATSAT by COMSAT.

## II. GRANT OF NATSAT'S APPLICATION WOULD SATISFY THE INTENT OF CONGRESS AND SERVE THE PUBLIC INTEREST

But for the fact that most of the domestic Big LEO applications were filed with the Commission prior to the Commission receiving auction authority from Congress in 1993, Big LEO licenses which have been granted to Motorola, TRW, and LQP for free would instead have been auctioned to the highest bidder. Thus, the Commission has a duty to allow applicants such as NATSAT the opportunity to enter the MSS industry as a way to foster competition in what is already an oligopoly.

In Section 309(j) of the Communications Act, Congress also mandated that the Commission "ensure that small businesses, rural telephone companies, and businesses owned by members of minority groups and women are given the opportunity to participate in the provision of spectrum-based services." 47 U.S.C. § 309(j)(4)(D). Thus, Congress has ordered that the Commission ensure that small businesses and minority entrepreneurs have the opportunity to "obtain licenses and provide [spectrum based] services."<sup>3</sup>

To achieve this goal, the statute requires the Commission to "consider the use of tax certificates, bidding preferences, and other procedures."<sup>4</sup>

NATSAT contends that the granting of its Application by the Commission

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<sup>3</sup> Fifth Report and Order, PP Docket No. 93-253, 9 FCC Rcd 5532 at ¶ 93 (1994).

<sup>4</sup> In 1995, Congress repealed the section of the Internal Revenue Code providing for the use of minority tax certificates.

qualifies as an "other procedure" by which the Commission can satisfy its Congressional mandate to promote "economic opportunity for a wide variety of applicants, including small businesses, rural telephone companies, and businesses owned by minorities and women." 47 U.S.C. § 309(j)(4)(C).

Thus, it is clear that Congress has mandated that the Commission maximize the opportunities for small minority-owned businesses, like NATSAT, to provide Big LEO services. And given the huge amounts of capital required (up to at least \$2 billion)<sup>5</sup> to construct, launch and operate an MSS system, it will be virtually impossible for a minority-owned small business such as NATSAT to compete in the Big LEO industry against such corporate giants as Motorola, TRW, and LQP without being able to utilize Big LEO Infrastructure which is already, or will very soon be, operational.

The Commission can satisfy its Congressional mandate of giving companies like NATSAT an opportunity to participate in spectrum-based services such as Big LEOs by granting NATSAT's Application forthwith.<sup>6</sup>

In addition to satisfying the intent of Congress, the Commission's granting of NATSAT's Application will also be in the public interest. Over the

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<sup>5</sup> Report and Order, CC Docket No. 92-166, 9 FCC Rcd 5936 at ¶ 30 (1994) ("*Big LEO Order*").

<sup>6</sup> In fact, the Commission has noted that there are presently no small businesses in the Big LEO industry, in that only six applications were filed to operate Big LEO systems and "none of the applicants qualifies as small, minority-owned or women-owned." *Big LEO Order* at ¶ 80. Furthermore, it appears that the two smaller Big LEO applicants, Constellation and MCHI, are experiencing financial difficulties and may not be able to make the requisite financial showing for constructing and launching their Big LEO systems. *See, Memorandum Opinion and Order*, DA 96-76 (Jan. 26, 1996) (giving Constellation and MCHI additional time to make the requisite financial showing). Thus, the need for NATSAT's presence in the Big LEO industry has become even more acute.

past several years, Commission policy increasingly has been marked by the resolution to open both domestic and international markets to competition and the broadest range of competitors.<sup>7</sup> The Commission has concluded time and again that competition serves to lower prices, increase consumer choices, and further develop the national and global information infrastructures. NATSAT's entry into the Big LEO marketplace will foster competition with an entrepreneurial spirit generally lacking with the Big LEO Providers, none of which are small or minority-owned businesses.

In light of the recent Commission actions to open up markets to competition, and given the recent enactment of the Telecommunications Act of 1996, it is clear that a grant of NATSAT's Application is in the public interest. Such grant will serve to make the Big LEO marketplace more competitive and expand consumer choice, lower prices, and help develop the national and global information infrastructures.

By granting NATSAT's Application, the Commission will also ensure that the Big LEO oligopoly is "kept honest," thereby resulting in more high-quality services at lower prices for consumers. Presently, the Big LEO industry in the United States consists of three actual licensees that do not presently offer service (Motorola, TRW and LQP); two potential licensees with financial

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<sup>7</sup> In the pending DISCO II proceeding, it was stated that it is the Commission's desire "to provide U.S. customers with the widest possible range of service options." See, NPRM re: Amendment of the Commission's Regulatory Policies to Allow Non-U.S.-Licensed Space Stations to Provide Domestic and International Satellite Services in the United States, IB Docket No. 96-111, FCC 96-210 (rel. May 14, 1996) ("DISCO II"). By granting NATSAT's Application, the Commission will be providing U.S. customers with the widest possible range of satellite service options.

problems (Constellation and MCH); an existing operator with an inferior product as well as financial problems (AMSC); and a potentially dominant existing operator internationally with regulatory problems at home (COMSAT).

This "group of seven" could very easily dwindle to three or four by the time Big LEO services are expected to be offered to the public beginning in 1999-2000. Such an oligopoly may not want to "rock the competitive boat," by offering advanced services quickly at low prices, absent some "spirited" entrepreneurial competition. However, if NATSAT is capable of using the Big LEO Infrastructure of Big LEO Providers to offer domestic MSS, then the oligopolists will always know that they run the risk of NATSAT beating them on price, technology, customer service, etc. By licensing NATSAT, the Commission can keep the Big LEO oligopoly honest!

Another advantage to the Commission of licensing NATSAT is that the Commission will be able to crack down on the unauthorized use of MSS in the United States. Presently, unscrupulous businesses offer various INMARSAT services illegally for domestic use in the United States, knowing that it is virtually impossible to locate and track such use. However, NATSAT, by virtue of its "ear-to-the-ground" presence in the wholesale and retail MSS market, will be able to unearth such schemes and convince the perpetrators to cease and desist or risk legal and/or regulatory action. In essence, as an MSS licensee, NATSAT will have a strong incentive to police the marketplace for unauthorized and illegal sale and use of unlicensed MSS.

Finally, the Commission has already stated that, at least with respect to small businesses such as NATSAT, the only way for them to participate in the Big LEO industry is “by leasing space segment capacity . . . or by offering services to end users.”<sup>8</sup> This is what NATSAT seeks to do and its Application, therefore, should be granted immediately.

Thus, based on the foregoing and ample Commission precedent, the Commission has the authority to grant NATSAT’s Application to provide domestic MSS using Big LEO Infrastructure of Big LEO Providers.

### **III. APPLICATION INFORMATION**

Based on the foregoing, NATSAT urges the Commission to grant it the authority to provide domestic MSS using the Big LEO Infrastructure of Big LEO Providers. In support of this Application, the following information is submitted as required by Sections 25.114 and 25.143 of the Commission’s Rules:

- (1) The name, address and telephone number of the Applicant is:

National Telecom Satellite Communications, Inc.  
Clearwater House  
2187 Atlantic Street  
Stamford, CT 06902  
(203) 425-4100

The Applicant is organized under the laws of the State of Delaware.

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<sup>8</sup> *Big LEO Order* at ¶ 80, note 93.



(2) Inquiries or correspondence concerning the Applicant should be sent to:

Jack E. Robinson  
President  
National Telecom Satellite Communications, Inc.  
Clearwater House  
2187 Atlantic Street  
Stamford, CT 06902  
(203) 425-4100

with a copy to:

David A. LaFuria, Esq.  
Lukas, McGowan, Nace & Gutierrez, Chartered  
1111 Nineteenth Street, N.W., Suite 1200  
Washington, D.C. 20036  
(202) 857-3500

(3) The Applicant seeks authority to use space segment, space stations and earth stations of any and all Big LEO providers, foreign and domestic, to provide U.S. domestic land mobile and aeronautical mobile satellite services ("MSS"), using Big LEO satellites and related space and earth station infrastructure covering the Atlantic and Pacific Ocean Regions. Applicant's service will cover the areas of the continental United States, Alaska, Hawaii, Puerto Rico, U.S. Virgin Islands, Guam, Northern Mariana Islands and American Samoa, in addition to their coastal waters. Applicant does not seek authorization to construct or launch any Big LEO systems.

(4) Applicant will not construct any new facilities to provide the requested services. The Applicant plans to offer a wide range of satellite-delivered mobile

personal communications services including, among other things, telephone, data, fax, and position-reporting services to individuals as well as governmental entities and businesses in the transportation, land mobile, maritime, aeronautical, disaster management, search and rescue, environmental monitoring, and fixed site markets.

(5) This information is already on file with the Commission and is included in the applications of Motorola, TRW, LQP, AMSC, COMSAT, Constellation and/or MCHI, among others.

(6)(i) Not applicable.

(6)(ii) See answer to item (5).

(6)(iii) See answer to item (5).

(7) through (14) See answer to item (5).

(15) See answer to item (3).

(16) through (18) See answer to item (5).

(19) See Applicant's recently-filed FCC Form 430, a copy of which is annexed hereto for the Commission's convenience.

(20) Applicant intends to provide MSS as a common carrier to the extent permitted by law and Commission Rules.

(21) See answer to item (5).

(22) See pages 4-7 herein.

(23) through (25) Not applicable.

(26) See answer to item (5).

(27) Not applicable.

(28) For information required pursuant to Section 25.143 of the Commission's Rules, see answer to item (5).

**Section 1.2002 Certification**

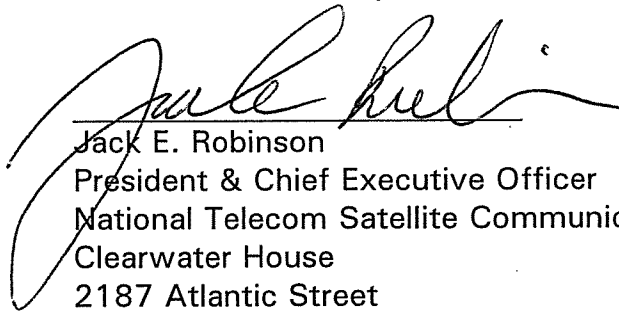
Pursuant to 47 C.F.R. § 1.2002, Applicant hereby certifies that it, its officers and directors, and any party with a five percent or greater interest in this request or the Applicant, are not subject to a denial of the Federal benefits requested herein pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 835(a).

**IV. CONCLUSION**

NATSAT requests that the Commission grant this Application immediately in furtherance of the public interest, convenience and necessity.

Respectfully submitted,

**NATIONAL TELECOM SATELLITE  
COMMUNICATIONS, INC.**



Jack E. Robinson  
President & Chief Executive Officer  
National Telecom Satellite Communications, Inc.  
Clearwater House  
2187 Atlantic Street  
Stamford, CT 06902  
(203) 425-4100

Its Attorneys:

David A. LaFuria, Esq.  
Lukas, McGowan, Nace & Gutierrez, Chartered  
1111 Nineteenth Street, N.W., Suite 1200  
Washington, D.C. 20036  
(202) 857-3500

July 10, 1996

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served on the following persons by first-class mail, postage prepaid, as of the date hereof:

Mr. Donald Gips  
Acting Chief  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W., Ste 800  
Washington, DC 20554

Mr. James Ball  
Associate Chief, Policy  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W., Ste 800  
Washington, DC 20554

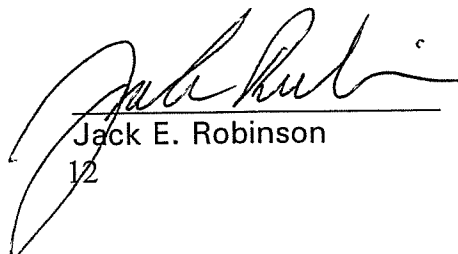
John Stern, Esq.  
Legal Advisor  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W., Ste 800  
Washington, DC 20554

Ms. Karen Kornbluh  
Telecommunications Policy Analyst  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W., Ste 800  
Washington, DC 20554

Mr. Tom Tycz  
Chief, Satellite & Radiocommunication Division  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W., Ste 800  
Washington, DC 20554

Ms. Cecily Holiday  
Deputy Chief, Satellite & Radiocommunication Division  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W., Ste 800  
Washington, DC 20554

Ms. Fern Jarmulnek  
Chief, Satellite Policy Branch  
Satellite & Radiocommunication Division  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W., Ste 800  
Washington, DC 20554

  
\_\_\_\_\_  
Jack E. Robinson  
12

LICENSEE QUALIFICATION REPORT

See reverse side for information regarding public burden statement.

INSTRUCTIONS

- A. The "Filer" of this report is defined to include: (1) An applicant, where this report is submitted in connection with applications for common carrier and satellite radio authority as required for such applications; or (2) A licensee or permittee, where this report is required by the Commission's Rules to be submitted on an annual basis.
- B. Submit an original and one copy (sign original only) to the Federal Communications Commission, Washington, DC 20554. If more than one radio service is listed in Item 6, submit an additional copy for each such additional service. If this report is being submitted in connection with an application for radio authority, attach it to that application.
- C. Do not submit a fee with this report.

<p>1. Business Name and Address (Number, Street, State and ZIP Code) of Filer's Principal Office:          National Telecom Satellite Communications, Inc.          2187 Atlantic Street          Stamford, CT 06902</p>	<p>2. (Area Code) Telephone Number:          (203) 425-4100</p> <p>3. If this report supercedes a previously filed report, specify its date:          First Report</p>
<p>4. Filer is (check one):  <input type="checkbox"/> Individual    <input type="checkbox"/> Partnership    <input checked="" type="checkbox"/> Corporation  <input type="checkbox"/> Other (Specify):</p>	<p>5. Under the laws of what State (or other jurisdiction) is the Filer organized?          Delaware</p>
<p>6. List the common carrier and satellite radio services in which Filer has applied or is a current licensee or permittee:          1.6/2.4 GHz Domestic Mobile Satellite Service</p>	

7(a) Has the Filer or any party to this application had any FCC station license or permit revoked or had any application for permit, license or renewal denied by this Commission? *If "YES", attach as Exhibit I a statement giving call sign and file number of license or permit revoked and relating circumstances.*     Yes     No

(b) Has any court finally adjudged the Filer, or any person directly or indirectly controlling the Filer, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement, or other means of unfair methods of competition? *If "YES", attach as Exhibit II a statement relating the facts.*     Yes     No

(c) Has the Filer, or any party to this application, or any person directly or indirectly controlling the Filer ever been convicted of a felony by any state or Federal Court? *If "YES", attach as Exhibit III a statement relating the facts.*     Yes     No

(d) Is the Filer, or any person directly or indirectly controlling the Filer, presently a party in any matter referred to items 7(b) and 7(c)? *If "YES", attach as Exhibit IV a statement relating the facts.*     Yes     No

8. Is the Filer, directly or indirectly, through stock ownership, contract or otherwise, currently interested in the ownership or control of any other radio stations licensed by this Commission? *If "YES", submit as Exhibit V the name of each such licensee and the licensee's relation to the Filer.*     Yes     No

If Filer is an individual (sole proprietorship) or partnership, answer the following and Item 11:

<p>9(a) Full Legal Name and Residential Address (Number, Street, State and ZIP Code) of Individual or Partners:</p>	<p>(b) Is individual or each member of a partnership a citizen of the United States?    <input type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>(c) Is individual or any member of a partnership a representative of an alien or of a foreign government?    <input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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If Filer is a corporation, answer the following and Item 11:

10(a) Attach as Exhibit VI the names, addresses, and citizenship of those stockholders owning of record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries.

(b) List below, or attach as Exhibit VII the names and addresses of the officers and directors of the Filer.

Jack E. Robinson > 2187 Atlantic Street  
 Daniel E. Carpenter > Stamford, CT 06902

(c) Is the Filer directly or indirectly controlled by any other corporation?

If "YES", attach as Exhibit VIII a statement (including organizational diagrams where appropriate) which fully and completely identifies the nature and extent of control. Include the following: (1) the address and primary business of the controlling corporation and any intermediate subsidiaries; (2) the names, addresses, and citizenship of those stockholders holding 10 percent or more of the controlling corporation's voting stock; (3) the approximate percentage of total voting stock held by each such stockholder; and (4) the names and addresses of the president and directors of the controlling corporation.

Yes  No

(d) Is any officer or director of the Filer an alien?

Yes  No

(e) Is more than one-fifth of the capital stock of the Filer owned of record or voted by aliens or their representatives, or by a foreign government or representative(s) thereof, or by a corporation organized under the laws of a foreign country?

Yes  No

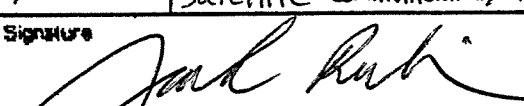
(f) Is the Filer directly or indirectly controlled: (1) by any other corporation of which any officer or more than one-fourth of the directors are aliens, or (2) by any foreign corporation or corporation of which more than one-fourth of the capital stock is owned or voted by aliens or their representatives, or by a foreign government or representatives thereof?

Yes  No

(g) If any answer to questions (d), (e) or (f) is "YES", attach as Exhibit IX a statement identifying the aliens or foreign entities, their nationality, their relationship to the Filer, and the percentage of stock they own or vote.

11. CERTIFICATION

This report constitutes a material part of any application which cross-references it, and all statements made in the attached exhibits are a material part thereof. The ownership information contained in this report does not constitute an application for, or Commission approval of, any transfer of control or assignment of radio facilities. The undersigned, individually and for the Filer, hereby certifies that the statements made herein are true, complete and correct to the best of Filer's knowledge and belief, and are made in good faith.

WILLFUL FALSE STATEMENTS MADE ON THIS APPLICATION ARE PUNISHABLE BY FINE AND IMPRISONMENT (U.S. Code, Title 18, Section 1001) and/or REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)).	Date	Filer (Must correspond with that shown in item 1)	Typed or Printed Name
	7/10/96	National Telecom Satellite Communications, Inc.	Jack E. Robinson
	Signature		TITLE
			President

NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT OF 1974 AND THE PAPERWORK REDUCTION ACT OF 1980

The solicitation of personal information requested in this form is to determine if you are qualified to become or remain a licensee in a common carrier or satellite radio service pursuant to the Communications Act of 1934, as amended. No authorization can be granted unless all information requested is provided. Your response is required to obtain the requested authorization or retain an authorization.

Public reporting burden for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Federal Communications Commission, Office of Managing Director, Washington, DC 20554, and to Office of Management and Budget, Paperwork Reduction Project (3060-0106), Washington, DC 20503.

**National Telecom Satellite Communications, Inc.**  
**FCC Form 430**  
**July 10, 1996**  
**Page 1.**

**Exhibit 1:**

An affiliate of National Telecom Satellite Communications, Inc. ("NATSAT" or the "Applicant"), National Telecom PCS, Inc. ("NatTel PCS"), had its application for a C-Block PCS license denied by an Order of the Wireless Telecommunications Bureau ("WTB") dated May 30, 1996. That application, Application No. 00126-CW-L-96, was denied because the WTB denied a petition by NatTel PCS for waiver of the C-Block rules and then ruled that NatTel PCS was in default of the down payment requirements, although NatTel PCS had more than enough funds on deposit with the Commission to satisfy the down payment requirements. NatTel PCS has appealed the WTB's decision to the full Commission and is confident it will ultimately be reversed either by the full Commission or the courts.



**National Telecom Satellite Communications, Inc.**  
**FCC Form 430**  
**July 10, 1996**  
**Page 2**

**Exhibit V:**

NATSAT has as affiliates NatTel PCS and PCS National Wireless, Inc. ("PCS National"). Although licenses have not yet been issued by the Commission, NatTel was the high bidder in the C-Block PCS auction for the American Samoa BTA (BTA 492) and PCS National was the high bidder in the 900 MHz SMR auction for licenses covering the American Samoa MTA (M051A through M051T), Honolulu MTA (M047H), and the Puerto Rico-U.S. Virgin Islands MTA (M025R).

**Exhibit VIII:**

All of the outstanding capital stock (1000 common voting shares) of the Applicant is owned by NATTEL, L.L.C., a Delaware limited liability company.

(1) The address of NATTEL, L.L.C. is: Clearwater House, 2187 Atlantic Street, Stamford, CT 06902. Its primary business is as a holding company of various entities that own and/or control wireless licenses.

(2) The sole members of NATTEL, L.L.C. are Jack E. Robinson and Daniel E. Carpenter, both of whom are United States citizens and have an address of: Clearwater House, 2187 Atlantic Street, Stamford, CT 06902.

(3) Mr. Robinson holds 51% of the member interests and Mr. Carpenter holds 49% of the member interests in NATTEL, L.L.C. As the sole managing member, Mr. Robinson has sole voting control over NATTEL, L.L.C. and, indirectly, the Applicant.

(4) The directors and officers of NATTEL, L.L.C. are Messrs. Robinson and Carpenter, both of whom have an address of Clearwater House, 2187 Atlantic Street, Stamford, CT 06902. Mr. Robinson is President of NATTEL, L.L.C. and the Applicant.