



FCG/MELLON OCT 06 1994

**COMSAT
General Corporation**

Communications
Satellite Corporation
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October 6, 1994

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DOMESTIC FACILITIES DIVISION
SATELLITE RADIO BRANCH

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Common Carrier Domestic Satellites
Post Office Box 358160
Pittsburgh, Pennsylvania 15251-5160

Re: Request for Special Temporary Authority
Call Sign KS-29

Attn: Ms. Fern J. Jarmulnek
Common Carrier, Satellite Radio Branch

2-DSS-STA-95

Dear Mr. Caton:

COMSAT General Corporation ("COMGEN"), pursuant to Section 25.119 of the Commission's Rules, hereby requests an extension of Special Temporary Authority to operate the COMSTAR D-4 satellite (KS-29) at 76° W.L. using the COMSAT Maneuver, from October 15, 1994 to April 15, 1995.

All operation of the satellite will be consistent with the Commission's previous grants of Special Temporary Authority and COMGEN will submit reports evaluating satellite operations during the period of Special Temporary Authority. The current orbital inclination of the D-4 is approximately 7.7 degrees. To COMGEN's knowledge, there is no other use planned for 76° W.L. during the period covered by this Request.

COMGEN continues to successfully operate the COMSTAR D-4 using the COMSAT Maneuver and, thereby, has extended significantly its useful life. During its extended lifetime, no adjacent satellite interference has been observed in either space or ground segment with satellites spaced two degrees apart. Continued operation using the COMSAT Maneuver is anticipated to extend the useful life of the satellite at least another five years.

Grant of this request for Special Temporary Authority is in the public interest because it will permit COMGEN to meet commercial demand for satellite service over the COMSTAR D-4 satellite. At present, COMGEN is providing its customer, COMSAT Mobile Communications ("CMC"), with space segment facilities to conduct an experiment which will help to determine the viability

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of providing maritime radio communications using C-band. CMC's experiment is being conducted using transponders 6H and 7H on the COMSTAR D-4. A test report describing this experiment and the operation of the satellite was previously provided to the Commission on August 30, 1994.¹ As demonstrated in the report, the COMSTAR D-4 is functioning better than expected and there have been no reports of interference to space or ground communications facilities from its operation.

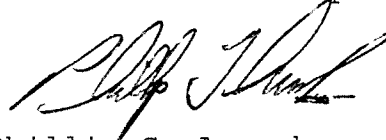
COMGEN hereby certifies that neither it, its officers and directors, nor any party with a five percent or greater interest in this request for special temporary authorization are subject to a denial of the federal benefits requested herein pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853 (a).

If you have any questions, please contact the undersigned or Counsel Philip V. Permut at (202) 429-7250.

The requisite filing fee of \$575.00 is enclosed.

Respectfully submitted,

COMSAT General Corporation

A handwritten signature in dark ink, appearing to read "Phillip G. Avruch", is written over the printed name.

Phillip G. Avruch
Assistant Secretary

¹See Letter to William F. Caton, from Phillip G. Avruch, Assistant Secretary, COMGEN, dated August 30, 1994, which seeks to extend the Special Temporary Authority for the COMSTAR D-4 to send and receive transmissions in the maritime environment.