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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
L/Q LICENSEE, INC. )  
 )  
Applications for Waiver and )  
Modification of License to Construct, )  
Launch and Operate a Low Earth )  
Orbiting Satellite System to Provide )  
Mobile-Satellite Service in the )  
1.6/2.4 GHz Bands )

File Nos. 88-SAT-WAIV-96  
90-SAT-ML-96

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Satellite Policy Branch  
International Bureau

COMMENTS OF CONSTELLATION COMMUNICATIONS, INC.

Constellation Communications, Inc. ("Constellation"), by its attorneys, hereby submits these comments on the two referenced filings of L/Q Licensee, Inc. ("LQL"). LQL seeks a waiver of the Commission's rules to use for feeder links the 5091-5250 MHz and 6875-7055 MHz frequency bands consistent with the International Table of Frequency Allocations, as modified at WRC-95. LQL also requests that the Commission modify LQL's authorization to construct, launch and operate a low-Earth orbit satellite system in the Mobile Satellite Service ("MSS") Above 1 GHz to use these frequencies for feeder links.

Constellation is an applicant for a low-Earth orbit ("LEO") satellite system in the 1610-1626.5 MHz and 2483.5-2500 MHz bands.<sup>1/</sup> Constellation also proposes to use for its feeder links the same 5 and 6/7 GHz frequency bands allocated by the 1995 World Radiocommunications

<sup>1/</sup> See application File Nos. 17-DSS-P-91(48) and CSS-91-013, as amended on November 16, 1994.

Conference ("WRC") which LQL addresses in these filings. The modifications proposed by LQL may adversely affect Constellation's proposed system unless appropriate coordination is undertaken between Constellation and LQL.

LQL's feeder link operations are capable of causing harmful interference to Constellation's satellites when the LQL satellites are in-line with Constellation's satellites. However, LQL provides an assurance that "[i]f other U.S. or foreign systems are authorized to use these bands, LQL will comply with the Commission's and ITU's coordination procedures."<sup>2/</sup>

With respect to LQL's request for recognition of the power flux density ("p.f.d.") limits adopted by the WRC-95, LQL does not explicitly state the precise p.f.d. levels it proposes to operate at in the 2483.5-2500 MHz band. However, it does state that "[p]ower into the individual S-band beams of the Globalstar system is controlled to be consistent with the S-band p.f.d. requirements at the Earth's surface" and that "Globalstar plans to operate at all times at or below the p.f.d. levels approved for the international allocations."<sup>3/</sup> Such operations require inter-system coordination agreements in order to insure that systems do not cause unacceptable interference by operating at too high a p.f.d. level or require unacceptable limitations on other systems by operating at too low a p.f.d. level.<sup>4/</sup>

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<sup>2/</sup> LQL "Request for Waiver", File No. 88-SAT-WAIV-96, at 11.

<sup>3/</sup> See LQL modification application, File No. 90-SAT-ML-96, at 5.

<sup>4/</sup> See Comments of Constellation Communications, Inc. filed on February 23, 1996 concerning the application of TRW, Inc., File No. 155-SAT-ML-95, at 2-3. LQL also appears to agree with the need for an agreed upon p.f.d. level for inter-system coordination. See LQL Comments filed on February 23, 1996 on the same TRW application, at 6-7.

Constellation has no objections to these requests as long as any grant to LQL does not prejudice Commission action with respect to Constellation's pending application, and LQL's use of these frequencies is subject to coordination with all affected systems, including Constellation, as described above.

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Dated: April 19, 1996

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Comments of Constellation Communications, Inc. was sent by first-class mail, postage prepaid, this 19th day of April 1996, to each of the following:

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