



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Telecommunications and**  
**Information Administration**  
Washington, D.C. 20230

Doc. 30021/1-2.8.2.1/4.9.2  
Ref. Doc. 29974/1-2.8.2.1/4.9.2

November 22, 1996

William R. Torak  
Federal Communications Commission  
Office of Engineering and Technology  
FCC Liaison Representative, IRAC  
2000 M. Street, N.W., Suite 230  
Washington, D.C. 20554

Dear Mr. Torak:

NTIA comments concerning the proposed ORDER AND AUTHORIZATION for L/Q LICENSEE INC. (IRAC Doc. 29974) in the bands 1610-1626.5, 2483.5-2500, 5000-5250, and 6875-7075 are as follows:

1. The document concerns only the authorization for the space segment and not the earth stations;
2. This ORDER AND AUTHORIZATION shall not prejudice any future actions (e.g., amendments to the National Allocation Table and Part 25 of the FCC rules, consideration of any coordination requests);
3. Concerning the band 1610-1626.5 MHz, NTIA and FCC are continuing to have discussions on the protection of the radio astronomy and radionavigation-satellite services from earth station transmissions;
4. Concerning the band 5000-5250 MHz,
  - a. the aeronautical radionavigation service microwave landing system (MLS) must be protected from interference;nationally,
  - a. the proposed fixed-satellite service (Earth-to-space) operations in the band are not in conformance with the National Table of Frequency Allocations and therefore, must be conducted on an unprotected, non-interference basis;
  - b. discussions will be necessary to determine the rules (e.g., Part 25) that will be applicable to the fixed-satellite service (Earth-to-space) (e.g., minimum earth station elevation angle, power limits, earth station antenna criteria);

c. each individual earth station will need to be coordinated with NTIA;

d. the telecommand frequency, with a higher spectral power density averaged over 26 kHz (see ITU-R Study Group 4) than the communication links and centered at 5091.5 MHz, will make coordination with the MLS operations in the band 5000-5091 MHz more difficult than if the frequency had been higher in the band 5091-5150 MHz and may result in additional constraints being placed on GLOBALSTAR earth station transmissions;

internationally,

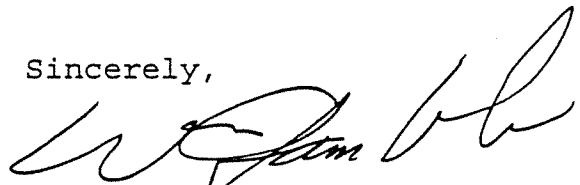
a. S5.444 states that the band 5000-5150 is to be used for the operation of the international standard systems (microwave landing system) for precision approach and landing and that the requirements of this system shall take precedence over other uses of the band;

b. S5.444A states after January 1, 2008, no new assignments shall be made to stations providing feeder links of non-geostationary mobile-satellite systems in the band 5091-5150 MHz, and that after January 1, 2010, the fixed-satellite service will become secondary to the aeronautical radionavigation service in this band.

We request that the above comments be reflected in the ORDER AND AUTHORIZATION.

If you have any questions please contact me or Edward Davison (phone (202)-482-1164; telefax (202)-482-2830; email edavison@ntia.doc.gov) of my staff.

Sincerely,



William D. Gamble  
Deputy Associate Administrator  
Office of Spectrum Management

cc: E. Davison  
W. Hatch