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MAR 25 1992

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

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MAR 24 1992

Domestic Facilities Division
Satellite Radio Branch

Federal Communications Commission
Office of the Secretary

In the Matter of the Applications)
of)
AMERICAN MOBILE SATELLITE)
CORPORATION)

File No. 420-DSE-P/L-90

For Blanket License for 30,000)
Mobile Earth Stations)

ROCKWELL INTERNATIONAL CORPORATION)

File No. 933-DSE-P/L-90

For Blanket License for 15,000)
Mobile Earth Stations)

GEOSTAR MESSAGING CORPORATION)

File No. 2306-DSE-P/L-89

For Blanket License for 10,000)
Mobile Earth Stations)

In the 1530-1544 MHz (downlink))
and 1626.5-1645.5 MHz (uplink))
Bands)

COMMUNICATIONS SATELLITE)
CORPORATION WORLD SYSTEMS DIVISION)

File No. I-T-C-90

For authority pursuant to Section)
214 of the Communications Act of)
1934 to establish and operate)
communications channels via the)
INMARSAT system using a MARISAT)
satellite and an earth station at)
Southbury, CT (WB-36) for interim)
use by the authorized domestic)
mobile satellite service (MSS))
carrier in its provision of)
domestic MSS services)

COMMENTS OF ROCKWELL INTERNATIONAL CORPORATION

Rockwell International Corporation ("Rockwell") hereby
submits its comments on AMSC's Petition for Partial
Reconsideration of the Order and Authorization in the above-
captioned proceedings.

I. SUMMARY

In its Petition, AMSC is seeking FCC-imposed technical standards to require that all mobile terminals initially used for interim service over INMARSAT will be capable of use over AMSC's permanent satellite. In addition, AMSC seeks to compress the time frame afforded for interim users to transition to its permanent system. As detailed below, Rockwell believes that the marketplace will compel providers of interim LMSS service to utilize equipment that is consistent with a smooth transition to the permanent system, and that the compression of the time frame for that transition is unnecessary.

II. INTRODUCTION

A. Description of Petition

AMSC asks the Commission to reconsider the Order and Authorization in two respects. First, it urges the Commission to "establish minimum technical requirements for mobile terminals."¹ Specifically, it recommends that terminals be capable of operating throughout the L-band; be capable of operating at an EIRP of at least 10 db less than their nominal EIRP operating on the INMARSAT global beam; be capable of working through a spot beam satellite; and be designed to provide real-time priority preemptive access for AMSS(R) and provide protection against interference from

¹ Petition at 3.

other systems. Second, AMSC proposes to require service providers to work with AMSC to complete the transition to AMSC's permanent system no later than 60 days after AMSC launches its satellite and certifies that it is in compliance with its authorization.

B. Rockwell's Interest

As the holder of a license to provide interim land mobile domestic communications as a customer of AMSC, Rockwell would be directly affected by both aspects of the relief AMSC seeks:

- Rockwell already has invested substantial resources in developing mobile terminals for use in the interim system. AMSC's request that those terminals comply with yet-to-be-determined technical standards creates considerable uncertainty and threatens to delay the initiation of interim service. Moreover, Rockwell believes marketplace forces would achieve the same result -- a minimally burdensome transition to the permanent system -- that AMSC seeks to accomplish through regulatory fiat. The Commission should promptly determine whether compliance with such standards will be required, and if so, should set an expedited deadline for their development.

- The compressed transition schedule would impose significant and unwarranted burdens on Rockwell and its customers. Yet, AMSC does not state a compelling need for

the shortened transition period and does not address whether such a brief transition could be practically implemented.

III. THE COMMISSION SHOULD RESOLVE UNCERTAINTY REGARDING
EQUIPMENT STANDARDS IN A MANNER THAT EXPEDITES SERVICE
TO END USERS.

In the Order and Authorization, the Commission found that it was unnecessary to "adopt type acceptance criteria for LMSS terminals that are to operate in the lower L-band" because "Inmarsat will not type accept any equipment it determines may pose a threat to its system ..."² In addition, the Commission stated that it would be "premature" to require providers of interim service to demonstrate that their terminals will protect upper L-band aeronautical operations.³

Based on these holdings, Rockwell already has invested considerable resources in developing mobile equipment for its interim service. Indeed, Rockwell plans to begin building these units in June, with the goal of commencing service by October. AMSC's Petition casts considerable doubt on these plans and threatens to significantly delay the offering of LMSS to the public.

² Order and Authorization at para 17.

³ Id. at para 19. In so holding, the Commission explained that parties seeking to operate in that spectrum would have to submit applications which would be reviewed for "compliance with upper L-band allocation requirements." In a footnote, the Commission specifically referenced the technical comments discussed on pages 4-5 of AMSC's Petition. Id. at note 36.

As justification for its request that the Commission reverse course, AMSC suggests that minimum technical standards applicable to upper L-band service are "essential to a seamless and inexpensive transition."⁴ Rockwell certainly shares AMSC's goal of a smooth transition to permanent service, but it believes that the relief AMSC seeks is unnecessary. Quite simply, in a competitive marketplace, providers of interim service will have every incentive to ensure that their customers face minimal expense and burdens in transitioning to service on AMSC's system.

Nonetheless, if the Commission concludes that it is appropriate to re-visit this issue, it should promptly determine, as a threshold matter, whether mobile terminals will be required to comply with the requirements proposed in AMSC's Petition from the initiation of interim service. If so, the Commission must direct all entities responsible for developing the relevant standards to complete their work in accordance with an expedited deadline. These steps are essential in order to restore stability to the marketplace, permit certainty in investment decisions, and ensure the rapid deployment of this valuable new service.

⁴ Petition at 2.

IV. THE COMMISSION SHOULD NOT GRANT AMSC'S REQUEST FOR A COMPRESSED TRANSITION PERIOD.

The Order and Authorization directs "all interim LMSS service providers to report their transition plans to the Commission within 90 days after the launch of AMSC's first satellite."⁵ This requirement was imposed in order to fulfill the Commission's expectation of "a smooth transition of domestic LMSS traffic to the AMSC system as soon as possible."⁶

Having created uncertainty and potential delay with regard to interim service, as noted above, AMSC now asks the Commission to compress the transition period. Specifically, AMSC wants to require that all traffic would be transitioned from the INMARSAT satellite within 60 days after AMSC launches its own satellite and certifies that it is in compliance with the terms of its authorization.

Rockwell estimates that up to six months may be necessary following launch of AMSC's satellite in order to ensure a trouble-free transition that is minimally burdensome to end users. Cutting this period by two-thirds or more, as AMSC suggests, is unnecessary and raises the potential for serious disruptions.

⁵ Order and Authorization at para 6.

⁶ Id.

V. CONCLUSION

Rockwell agrees with AMSC's intent to insure a trouble-free transition to AMSC's permanent satellite system but does not concur with AMSC that this needs to be managed by regulations.

The Commission should promptly determine whether LMSS terminals will be required to comply with technical requirements relevant to upper L-band operation from the initiation of lower L-band service. If so, those requirements should be specified as quickly as possible. In addition, the Commission should deny AMSC's request for reconsideration of the transition schedule.

Respectfully submitted,

ROCKWELL INTERNATIONAL CORPORATION

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March 24, 1992

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March, 1992, I caused copies of the foregoing "Comments" to be mailed via first-class postage prepaid mail to the following:

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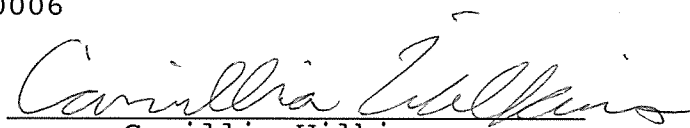
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