



American Mobile Satellite Corporation 1150 Connecticut Avenue, NW  
Fourth Floor

Washington DC  
20036

202/872-7621  
Fax 202/331-7213

Lon C. Levin  
Vice President and Regulatory Counsel

RECEIVED

November 22, 1991

NOV 25 1991

James R. Keegan  
Chief, Domestic Facilities Division  
Common Carrier Bureau  
Federal Communications Commission  
Room 6010  
2025 M Street, N.W.  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: AMSC Request for Special Temporary Authority  
File No. ~~420-DSE-P-L-90~~ 157-SSA-92

Dear Mr. Keegan:

This letter is for the purpose of requesting expedited action on the above-referenced request for Special Temporary Authority. AMSC has leased capacity on Marisat to provide an early Mobile Satellite Service in advance of the launch of its dedicated satellites. Pending at the Commission is an application for authority to operate up to 30,000 mobile units using the Marisat capacity. To meet immediate needs, however, AMSC has requested the instant STA for 750 mobile units. These units have been type approved for non-interference by Inmarsat, and will operate on dedicated frequencies assigned by Inmarsat to AMSC in a manner that assures that they will not cause interference to other users of Inmarsat space segment. In a November 11 letter to you, John S. Hannon, Vice President of Legal Affairs for Comsat Mobile Communications, confirmed that Inmarsat has concluded that the mobile units satisfy its non-interference requirements.

Aeronautical Radio, Inc. is the only entity that objects in any way to grant of the STA. Letter from John L. Bartlett to James R. Keegan (October 18, 1991). Arinc requests that the Common Carrier Bureau place the same conditions on AMSC's grant as the Private Radio Bureau placed on Arinc's use of Inmarsat space segment. October 18 Bartlett letter, citing Memorandum, Opinion and Order, DA 90-691 (May 9, 1990). Arinc initially contended that AMSC's mobile units could cause interference to aeronautical safety communications. But in a recent letter to the Commission, Arinc no longer raises this issue. Letter from John L. Bartlett to James R. Keegan (November 11, 1991). AMSC

hopes that the focus of the more recent letter from Mr. Bartlett reflects Arinc's acceptance of the proposition that a grant of AMSC's STA request does not threaten aviation safety communications.

There is no reason to impose any conditions on AMSC's deployment of mobile units. AMSC is the authorized U.S. provider of Mobile Satellite Service. Its provision of interim service is consistent with that authorization and furthers the Commission goal of service being provided as soon as possible. As discussed above, there is ample evidence that the mobile units will not cause interference to other users. Because AMSC is providing land mobile service, it does not need any waivers of Part 87 rules that were applied to Arinc's request.

Therefore, AMSC urges the Commission to act expeditiously to grant the above-referenced request for Special Temporary Authority.

Very truly yours,

*Lon C. Levin* <sup>BSJ</sup>

Lon C. Levin

cc: John L. Bartlett  
Phillip Schneider  
James E. Landry  
Warren Y. Zeger  
William E. Zimsky  
Elizabeth H. Hayes  
J. Geoffrey Bentley  
Bruce D. Jacobs