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RECEIVED
November 11, 1991

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DOMESTIC FACILITIES DIVISION
SATELLITE RADIO BRANCH

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Federal Communications Commission
Office of the Secretary

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

Re: Request for Special Temporary Authority -- File No. 420-DSE-P/L-90

157-SSA-92

Dear Mr. Keegan:

COMSAT Mobile Communications (COMSAT) would like to provide the following information concerning the above captioned request for Special Temporary Authority:

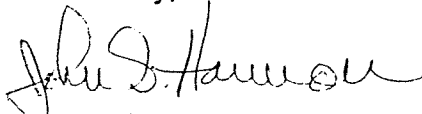
1. In July of 1989, at the request of American Mobile Satellite Corporation (AMSC), COMSAT secured Inmarsat System space segment for approximately a two year, eight month period so AMSC could provide a domestic mobile satellite data service.
2. In July of 1989, COMSAT entered into a Lease Service Agreement with AMSC (AMSC-COMSAT Agreement) that specified, among other things, terms and conditions for accessing the Inmarsat space segment. In particular, the AMSC-COMSAT Agreement requires that any mobile earth terminal (MET) that accesses AMSC's leased space segment must be demonstrated to be either: (a) fully compliant with the Inmarsat Standard C System Definition Manual; or (b) "of such design that in any form of operation, the ME[T]s' transmissions cannot cause harm to, or interfere with any other element in the INMARSAT system, including any other approved ME[T], any aeronautical earth station (AES), any ship earth station (SES), any coast earth station (CES), any land earth station (LES), any ground earth station (GES), any network control center (NCC), or any communication satellite or any other operating point of the Inmarsat system."
3. COMSAT's agreement with the Inmarsat Directorate for the capacity referred to in paragraph 1, above, provides that the Directorate will authorize a "non-interfering" mobile terminal to access the leased space segment following a review of test data that demonstrates the terminal's transmissions cannot cause harm to or interfere with the Inmarsat space segment or other services or users in the Inmarsat System.

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4. In December of 1990, the Inmarsat Directorate completed a review of test results submitted by COMSAT for access of AMSC's non-interfering MET (Hughes Network Systems 3100, developed by Hughes for AMSC) to Inmarsat space segment. The Directorate concluded, based on the test results, that it was "satisfied that the 'Hughes Network Systems 3100' model non-interfering ME[T] has been demonstrated to satisfy the approval requirements set out in the...agreement" described in paragraphs 1 and 3, above.

The Hughes Model 3100 non-interfering MET, as configured during the Inmarsat test review, has therefore been authorized to access the Inmarsat space segment in assigned specific frequencies and, if any of the METs operate in frequencies other than those specifically allocated, the Inmarsat authorization will be immediately withdrawn.

Sincerely,



John S. Hannon

cc: John L. Bartlett, Esq.
James E. Landry, Esq.
Lon C. Levin, Esq.