



American Mobile

DUPLICATE

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VIA COURIER DELIVERY TO MELLON BANK

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, SW
Washington, D.C. 20554

**Re: Request for Extension of Special Temporary Authority
File No. 681-DSE-MP/L-95**

Dear Ms. Roman Salas:

AMSC Subsidiary Corporation ("AMSC"), respectfully requests that the Commission extend its special temporary authority ("STA") to operate 10,000 half-duplex mobile earth terminals ("METs") with a transmit bandwidth of 20 kHz under its above-captioned blanket license for mobile data terminals for an additional 180 days. The Commission granted the original STA on February 12, 1999 and it has since been extended through February 12, 2000. Grant of this extension request will allow operation of these terminals until August 12, 2000.

AMSC's existing half-duplex terminals have a transmit bandwidth of 5 kHz, consistent with its underlying authorization. The METs that are the subject of this request are manufactured by Vistar Telecommunications, Inc. ("Vistar"). Because of the nature of Vistar's traffic and the efficient design of the service, the Vistar terminals use very little spectrum; up to 50,000 Vistar terminals can operate on a single 20 kHz transmit channel and 5 kHz receive channel. Grant of this STA extension request is in the public interest, as these spectrum-efficient Vistar terminals will be used to transmit alarm and positional data, and other low-data-volume traffic from mobile units such as trucks, trailers, freight cars, and similar vehicles.

The additional terminals will otherwise operate within the parameters of AMSC's existing authorization. The level of out-of-band and spurious emissions from these terminals conforms to Section 25.202(f) of the Commission's rules and to the Memorandum of Understanding among the FCC, NTIA, and the FAA, thus providing sufficient protection to GPS and Glonass. These terminals also comply with the Commission's proposed limits on out-of-band emissions from terminals operating in the

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MSS L-band. Specifically, the Vistar terminals satisfy the Commission's proposed out-of-band emissions limit of -70 dBW/MHZ averaged over any 20 ms period for wide band emissions occurring between 1559-1605 MHZ and -80 dBW/700 Hz for narrow band emissions occurring between 1559-1605 MHZ, over a measurement bandwidth of 700 Hz. See Amendment of Parts 2 and 25 to Implement the Global Mobile Personal Communications by Satellite (GMPCS) Memorandum of Understanding and Arrangements, *Notice of Proposed Rulemaking*, IB Docket No. 99-67, RM No. 9165 (rel. March 5, 1999).

A check in the amount of \$135.00, payable to the Federal Communications Commission, is enclosed to cover the requisite filing fee. AMSC hereby certifies that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §853(a).

Please address any questions concerning this matter to the undersigned.

Very truly yours,



Lon C. Levin

cc: Harry Ng
Frank Peace
Tom Tycz

