



American Mobile

FCC/MELLON

JUL 30 1999

RECEIPT COPY

Lon C. Levin  
Vice President and  
Regulatory Counsel

PHONE: 703 758 6150  
FAX: 703 758 6189  
EMAIL: lon.levin@ammobile.com

July 30, 1999

VIA COURIER DELIVERY TO MELLON BANK

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Request for Extension of Waiver of Footnote US315  
File No. 681-DSE-MP/L-95

Dear Ms. Salas:

AMSC Subsidiary Corporation ("AMSC") hereby requests an additional two-year extension of the Commission's waiver of Footnote US315 to Section 2.106 of the Commission's Rules. Grant of an extension of this waiver will permit AMSC to continue to provide vital data services to its subscribers in a manner consistent with the Commission's rules.

On August 1, 1995, the Commission granted AMSC special temporary authority to operate its satellite and approximately 3100 half-duplex mobile earth terminals ("METs") outside its assigned spectrum on the lower L-band.<sup>1</sup> In conjunction with this STA, the Commission also granted AMSC a waiver of Footnote US315 to Section 2.106 of the Commission's Rules, which requires MSS terminals operating in the lower L-band to provide priority access and real-time preemptive capability for maritime distress and safety communications. While the Commission found that AMSC's half-duplex terminals do not fully comply with Footnote US315 as a technical matter, it stated that, "[b]ased on AMSC's statistical analysis of average message length and related information, we believe that, under current

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AMSC Subsidiary Corporation For Modification of its Blanket License to Construct and Operate 30,000 L-Band Mobile Earth Stations, 10 FCC Rcd 10458 (1995). AMSC has continued to operate in the lower L-band under a succession of six-month STA grants. See FCC File Nos. 1433-SSA-MP/L-95, 300-SSA-EXT-96. This authority also covers the additional 18,000 METs transferred from Rockwell's authorization to AMSC's blanket license on November 20, 1996. See FCC File No. 179-DSE-MP/L-97.

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conditions. existing data METs in the lower L-band will provide sufficient distress and safety communication priority to comply with the intent of US315." 10 FCC Rcd at 10461. Accordingly, the Commission granted AMSC a two-year waiver, conditioned on AMSC's continued use of its AMSC Network Operations Center management and various operational standards.

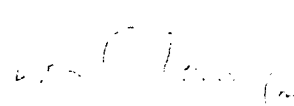
In July 1997, AMSC requested that the Commission grant a two-year extension of this waiver to permit the continued operation of AMSC's half-duplex terminals in the lower L-band. AMSC hereby requests an additional two-year extension of this waiver. Such an extension should enable AMSC to resolve issues pertaining to operation of terminals in the upper L-band.

AMSC has notified the U.S. Coast Guard ("USCG") of this request. The USCG did not object to the earlier request for an extension of the Commission's waiver of Footnote US315. In addition, AMSC will continue to adhere to the conditions established by the Commission in its 1995 Order.

Attached hereto is a check made payable to the Federal Communications Commission for the sum of One Hundred Thirty Dollars (\$135.00) to cover the fee associated with this filing. 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 or to Bruce Jacobs at (202) 775-3543.

Very truly yours,

  
Lon C. Levin

cc: Fern Jarmulnek  
Harry Ng

READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION  
REMITTANCE ADVICE

APPROVED BY OMB 3060-0589

LOCKBOX # 358160

PAGE NO. 1 OF 1

SPECIAL USE

FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) Fisher Wayland Cooper Leader and Zaragoza LLP		(3) TOTAL AMOUNT PAID (dollars and cents) \$ 135.00
(4) STREET ADDRESS LINE NO 1 2001 Pennsylvania Ave., N.W., #400		
(5) STREET ADDRESS LINE NO. 2		
(6) CITY Washington	(7) STATE DC	(8) ZIP CODE 20006
(9) DAYTIME TELEPHONE NUMBER (include area code) 202-659-3494	(10) COUNTRY CODE (if not in U.S.A.)	

IF PAYER NAME THE AND APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B  
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)

SECTION B - APPLICANT INFORMATION

(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card) AMSC Subsidiary Corporation		
(12) STREET ADDRESS LINE NO 1 10802 Parkridge Boulevard		
(13) STREET ADDRESS LINE NO 2		
(14) CITY Reston	(15) STATE VA	(16) ZIP CODE 20191
(17) DAYTIME TELEPHONE NUMBER (include area code) 703-758-6000	(18) COUNTRY CODE (if not in U.S.A.)	

COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEETS (FORM 159-C)

SECTION C - PAYMENT INFORMATION

(20A) PAYMENT TYPE CODE (PTC)	(21A) QUANTITY	(22A) FEE DUE FOR (PTC) IN BLOCK 20A	FCC USE ONLY
C G B	1	\$ 135.00	
(24A) FCC CODE 2			
(20B) PAYMENT TYPE CODE (PTC)		(21B) QUANTITY	(22B) FEE DUE FOR (PTC) IN BLOCK 20B
			\$
(24B) FCC CODE 2			
(20C) PAYMENT TYPE CODE (PTC)		(21C) QUANTITY	(22C) FEE DUE FOR (PTC) IN BLOCK 20C
			\$
(24C) FCC CODE 2			
(20D) PAYMENT TYPE CODE (PTC)		(21D) QUANTITY	(22D) FEE DUE FOR (PTC) IN BLOCK 20D
			\$
(24D) FCC CODE 2			

SECTION D - TAXPAYER INFORMATION (REQUIRED)

PAYER TIN 0530190523	(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2 APPLICANT TIN 0521735106
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SECTION E - CERTIFICATION

I, \_\_\_\_\_, (PRINT NAME) \_\_\_\_\_, Certify under penalty of perjury that the foregoing and supporting information are true and correct to the best of my knowledge, information and belief. SIGNATURE \_\_\_\_\_

SECTION F - CREDIT CARD PAYMENT INFORMATION

MASTERCARD/VISA ACCOUNT NUMBER	EXPIRATION DATE
MASTERCARD	MONTH YEAR
VISA	DATE
I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization(s) herein described	AUTHORIZED SIGNATURE

FISHER WAYLAND COOPER LEADER & ZARAGOZA LLP.

ATTORNEYS AT LAW

2001 PENNSYLVANIA AVENUE, N.W. SUITE 400

WASHINGTON, D.C. 20006-1851

202/659-3494

SIGNET BANK, N.A.  
WASHINGTON, D.C.

15-80-814  
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Check No.  
7575

PAY

TO THE  
ORDER OF

ONE HUNDRED THIRTY-FIVE AND 00/100

DATE

AMOUNT

07-30-99

\$135.00

FEDERAL COMMUNICATIONS COMMISS  
445 12 STREET, S.W.  
WASHINGTON, DC 20554

*Claw M J F*  
AUTHORIZED SIGNATURE

⑈007575⑈ ⑆054000807⑆ 667⑈ 1040324⑈

Security Features included. Details on back.