# FISHER WAYLAND COOPER LEADER & ZARAGOZA L.L.P. 2001 PENNSYLVANIA AVENUE, N.W.

SUITE 400

STEPHEN J. BERMAN (202) 429-4683

VIA HAND DELIVERY

Ms. Magalie Roman Salas Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

TELEPHONE 12021 659-34 TRANTED

February 9, 1999

Gate: 02/12/99 - 08-12-99

SUBJECT TO PREVIOUS STA sherman@lwclz.com

WEBSITE

http://www.fwclz.com

signature

Re:

Request for Special Temporary Authority

File No. 681-DSE-MP/L-95

Dear Ms. Salas:

On February 3, 1999, AMSC Subsidiary Corporation ("AMSC") requested that the Commission grant it special temporary authority ("STA") to operate half-duplex mobile earth terminals ("METs") with a transmit bandwidth of 20 kHz, manufactured by Vistar Telecommunications, Inc. ("Vistar"), under its above-captioned blanket license for mobile data terminals. (See attached.) AMSC's existing blanket license permits it to operate it up to 33,100 mobile data terminals, and, on behalf of AMSC, we hereby clarify that grant of this STA would allow it to operate up to 10,000 of these Vistar terminals.

In addition. AMSC indicated in its STA request that these Vistar terminals comply with NTIA's proposed limits on out-of-band emissions from terminals operating in the MSS L-band. Specifically, the Vistar terminals will comply with NTIA's proposed out-of-band emission 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 Letter to Regina M. Keeney, Chief, International Bureau, from Richard D. Parlow, Associate Administrator, Spectrum Management, National Telecommunications and Information Administration (September 18, 1997).

Please address any questions concerning this matter to the undersigned.

Very truly yours,

Stephen J. Berman

Hilliam Lemma

cc: Harry Ng
Frank Peace
Tom Tycz

FISHER WAYLAND COOPER LEADER & ZARAGOZA L.L.P. 2001 PENNSYLVANIA AVENUE, N.W. SUITE 400 WASHINGTON, D.C. 20006-1851 TELEPHONE (202) 659-3494 STEPHEN J. BERMAN FACSIMILE February 9, 1999 (202) 429-4683 (202) 296-6518 INTERNET VIA HAND DELIVERY sberman@fwclz.com Ms. Magalie Roman Salas WERSITE Secretary http://www.fwclz.com Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554 Re: Request for Special Temporary Authority File No. 681-DSE-MP/L-95 Dear Ms. Salas: On February 3, 1999, AMSC Subsidiary Corporation ("AMSC") requested that the Commission grant it special temporary authority ("STA") to operate half-duplex mobile earth terminals ("METs") with a transmit bandwidth of 20 kHz, manufactured by Vistar Telecommunications, Inc. ("Vistar"), under its above-captioned blanket license for mobile data terminals. (See attached.) AMSC's existing blanket license permits it to operate it up to 33,100 mobile data terminals, and, on behalf of AMSC, we hereby clarify that grant of this STA would allow it to operate up to 10,000 of these Vistar terminals. In addition, AMSC indicated in its STA request that these Vistar terminals comply with NTIA's proposed limits on out-of-band emissions from terminals operating in the MSS L-band. Specifically, the Vistar terminals will comply with NTIA's proposed out-of-band emission 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 Letter to Regina M. Keeney, Chief, International Bureau, from Richard D. Parlow, Associate Administrator, Spectrum Management, National Telecommunications and Information Administration (September 18, 1997). Please address any questions concerning this matter to the undersigned. Very truly yours, Mapher / Bermen Stephen J. Berman

cc:

Harry Ng Frank Peace Tom Tycz



### RECEIPT COPY

Lon C. Levin Vice President and Regulatory Counsel

PHONE: 703 758 6150 FAX:

703 758 6189

EMAIL:

lon.levin@ammobile.com

## VIA COURIER DELIVERY TO MELLON BANK

Ms. Magalie Roman Salas Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

Re:

Request for Special Temporary Authority

February 3, 1999

File No. 681-DSE-MP/L-95

Dear Mr. Caton:

AMSC Subsidiary Corporation ("AMSC") respectfully requests that the Commission grant it special temporary authority ("STA") to operate half-duplex mobile earth terminals ("METs") with a transmit bandwidth of 20 kHz under its above-captioned blanket license for mobile data terminals. On July 8, 1997, AMSC requested minor modification of this blanket license to permit the operation of these terminals on a permanent basis, and this application remains pending. (See attached.) Grant of the instant STA request, permitting operation of these terminals for 180 days, will not prejudice the Commission's consideration of the underlying minor modification request.

AMSC's existing half-duplex terminals have a transmit bandwidth of 5 kHz, consistent with its existing authorization. AMSC now intends to use METs 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 request is in the public interest, as these Vistar terminals will be used to efficiently 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 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 NTIA's proposed limits on out-of-band emissions from terminals operating in the MSS L-band.

Ms. Magalie Roman Salas February 3, 1999 Page 2

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: Harry Ng

Frank Peace

Tom Tycz

### 02-05-99 0358160 8160594 1 001 10



Mellon Bank FISHER WAYLAND COOPER LEADER & ZARAGOZA LL.P.

ATTORNEYS AT LAW

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SECTION D - TAXPAYER INFORMATION (REQUIRED)



February 3, 1999

Lon C. Levin Vice President and Regulatory Counsel

PHONE: 703 758 6150

703 758 6150 703 758 6189

FAX: EMAIL:

lon.levin@ammobile.com

#### VIA COURIER DELIVERY TO MELLON BANK

Ms. Magalie Roman Salas Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554 Received

FEB 1-6-1999

Satellite and

adiocommunications Division
International Bureau

Re:

**Request for Special Temporary Authority** 

File No. 681-DSE-MP/L-95

Dear Mr. Caton:

AMSC Subsidiary Corporation ("AMSC") respectfully requests that the Commission grant it special temporary authority ("STA") to operate half-duplex mobile earth terminals ("METs") with a transmit bandwidth of 20 kHz under its above-captioned blanket license for mobile data terminals. On July 8, 1997, AMSC requested minor modification of this blanket license to permit the operation of these terminals on a permanent basis, and this application remains pending. (*See* attached.) Grant of the instant STA request, permitting operation of these terminals for 180 days, will not prejudice the Commission's consideration of the underlying minor modification request.

AMSC's existing half-duplex terminals have a transmit bandwidth of 5 kHz, consistent with its existing authorization. AMSC now intends to use METs 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 request is in the public interest, as these Vistar terminals will be used to efficiently 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 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 NTIA's proposed limits on out-of-band emissions from terminals operating in the MSS L-band.

E900081 SES-STA-19990204-00190 AMSC SUBSIDIARY CORPORATION

> 10802 PARKRIDGE BOULEVARD RESTON VIRGINIA 20191-5416

703 758 6000 FAX 758 6111 Ms. Magalie Roman Salas February 3, 1999 Page 2

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: Harry Ng

Frank Peace

Tom Tycz

10802 Parkridge Blvd Reston VA 20191-5416 RECEIPT COPY



American Mobile Satellite Corporation

Lon C. Levin Vice President 703 758 6150 FAX 758 6189 Tevin@skyce...com

July 8, 1997

Received

FEB 1 6 1999

Satellite and Radiocommunications Division International Bureau

#### VIA COURIER DELIVERY TO MELLON BANK

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

Re:

Request for Minor Modification File No. 681-DSE-MP/L-95

Dear Mr. Caton:

AMSC Subsidiary Corporation ("AMSC") respectfully requests that the Commission modify the above-referenced authorization to permit AMSC to operate half-duplex mobile earth terminals ("METs") with a transmit bandwidth of 25 kHz. Consistent with its current authorization, AMSC's existing half-duplex terminals have a transmit bandwidth of 5 kHz. AMSC now intends to use METs manufactured by Vistar Telecommunications, Inc. ("Vistar"), and transmissions from these terminals require a wider bandwidth than do transmissions from AMSC's existing terminals. This greater transmit bandwidth is required by Vistar's use of CDMA technology, which enables up to ten terminals to transmit simultaneously.

These Vistar 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.

Attached hereto is a check made payable to the Federal Communications Commission for the sum of One Hundred Thirty Dollars (\$130.00) 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).

Mr. William F. Caton July 8, 1997 Page 2

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: Harry Ng

Frank Peace

Steve Sharkey

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(11B) NAME OF APPLICANT, LICENSEE, REGULATEE, OR DEBTOR FCC USE ONLY (12B) FCC CALL SIGN/OTHER ID (13B) ZIP CODE (14B) PAYMENT TYPE CODE (15B) QUANTITY (16B) FEE DUE FOR PAYMENT TYPE CODE IN BLOCK 14 (17B) FCC CODE 1 (18B) FCC CODE 2 (19B) ADDRESS LINE NO. 1 -(20B) ADDRESS LINE NO. 2 (21B) CITY/STATE OR COUNTRY CODE

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