

September 25, 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Received

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Attention: International Bureau

Satellite Policy Branch
International Bureau

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Communications Satellite Corp., Memorandum Opinion,
Order and Authorization, 4 FCC Rcd 7176 (1989)

Dear Mr. Caton:

In the above-referenced proceeding, the Common Carrier Bureau directed COMSAT Corporation ("COMSAT") to develop with American Mobile Satellite Corporation ("AMSC") "appropriate arrangements for hand-off of traffic between the INMARSAT system and AMSC's domestic system in accordance with the Commission's decision in CC Docket No. 87-75," and to submit periodic reports on the progress of those discussions. 4 FCC Rcd at 7180. By this letter and attachment, COMSAT submits its ninth report concerning this subject. This report has been coordinated with AMSC. We apologize for the delay in filing this report, which has resulted from COMSAT's and AMSC's efforts to resolve this matter.

This report has been coordinated with AMSC. COMSAT and AMSC will report on any further progress in 180 days. If you have any questions about this matter, please do not hesitate to contact the undersigned.

Sincerely,



Neal T. Kilminster

cc: Lon C. Levin, Vice President & Regulatory Counsel, AMSC

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HANDOFF OF AES BETWEEN COMSAT AND AMSC:
NINTH STATUS REPORT

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

AMSC and COMSAT are continuing coordination to work out the technical and operational details of procedures for handoff of traffic between the AMSC and Inmarsat systems. AMSC and COMSAT have reached the following understandings concerning the technical and operational standards relevant to handoff of traffic between the AMSC and Inmarsat systems.

The ICAO Aeronautical Mobile Communications Panel (AMCP) has finalized development and validation of Standards and Recommended Practices (SARPs) for the Aeronautical Mobile Satellite Service (AMSS). These SARPs define the requirements for accessing global beam, global plus spot beam and spot beam-only satellites, and thus include the AMSC spot beam-only case. The AMSS SARPs are silent, however, on how an owner/operator of an aeronautical terminal selects between systems.

The Requirements and Technical Concepts for Aviation (RTCA) Special Committee 165 (SC-165) has developed Minimum Operational Performance Standards (MOPS) for AMSS. These MOPS say nothing about system-to-system transfer, but instead refer to the Inmarsat Aeronautical System Definition Manual ("SDM").

The Inmarsat SDM repeats the SARPS definitions. It also provides for each AES to include an AES owner/operator table defining log-on and handover policies for users of the Inmarsat satellite system.

The AMSS SARPs, RTCA SC-165 MOPS, and the Inmarsat SDM, taken together, do not preclude the use of an Inmarsat-compliant AES to access the AMSC system, the transfer of an AES from one system to the other, or the user's ability to establish and implement policies regarding which system to use under what circumstances. Details of the AES enhancements required to provide access to the AMSC system will have to be worked out with the AES manufacturers as AMSC progresses towards the implementation of its domestic aeronautical mobile satellite service.