

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
AMENDMENT OF PART 80 OF )  
THE COMMISSION'S RULES )  
 )  
for an Allocation of Frequencies )  
for Digital Shipboard Earth )  
Stations )

RM-7912

ORIGINAL  
FILE

COMMENTS OF PAN AMERICAN SATELLITE

Pan American Satellite ("PAS"), by its attorneys, hereby comments in support of the above-referenced Petition for Rulemaking of Crescomm Transmission Services, Inc. ("Crescomm"). Crescomm is seeking amendment of Part 80 of the Commission's Rules, to allocate frequencies for digital shipboard earth stations ("DSESs").

As is discussed in the Petition, PAS currently provides space segment via its PAS-1 satellite to Crescomm in connection with tests of DSES services. These tests have involved a variety of maritime conditions over a period of more than three years: video transmissions from a ship, in connection with underwater exploration in the Mediterranean Sea, see Letter dated Nov. 18, 1988, from Gerald Brock, FCC, to Henry Goldberg, PAS Attorney (TAO-1475); a 30-day test of earth stations on board cruise ships located in the Caribbean Sea, communicating via PAS-1 with the PAS teleport in Florida, see Experimental Special Temporary Authorization, File No. S-0139-EX-90 (April 14, 1990); communications involving a U.S. Government contract and ships of

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U.S. registry located in the Caribbean Sea, see Experimental Special Temporary Authorization, File No. S-0348-EX-90 (Feb. 1, 1991), Experimental Construction Permit & License, File No. 2256-EX-PL-91 (Oct. 2, 1991); and service between cruise ships and various U.S.-based earth stations, for a wide variety of video, voice, and data applications, including services interconnected with public switched networks, see Experimental Construction Permit & License, File No. 2010-EX-PL-91 (Aug. 9, 1991).

PAS's experience with these shipboard earth stations, in the variety of settings outlined above, has been uniformly positive. The DSEs have operated in the manner expected, maintaining their communications with the PAS-1 satellite in a range of weather and ocean conditions. PAS has not received any complaints from its other customers or from other satellite providers about DSEs operations.

There would be unquestioned public interest benefits from the grant of Crescomm's Petition. As Crescomm notes, both U.S. Government agencies and cruise ship lines and their passengers have found the DSEs to be quite useful, and many new services have been made available that could not have been made available using Inmarsat's relatively limited offerings. The fact that the DSEs communicate directly with ordinary U.S. earth stations that are part of U.S. terrestrial networks offers an additional advantage, because it means that those on board ships may be in instant communication with the full range of U.S. facilities, without the need for an intervening, specialized "coast earth station."

Many of the regulatory barriers that currently separate "fixed" satellite services from "mobile" satellite services are no longer appropriate. The Commission long ago recognized, in the Qualcomm decision, that satellites intended for fixed communications could be usefully deployed for mobile communications, and the subsequent success of Qualcomm has proven the wisdom of the Commission's willingness to waive its rules. See Qualcomm, Inc., 4 F.C.C. Rcd. 1543 (1989). Here, Crescomm is similarly asking for an opportunity to serve the public interest by using fixed-satellite frequencies for mobile communications, and it has demonstrated the feasibility of its concept through the experimental activities referred to above.

CONCLUSION

In light of the demonstrated technical viability and the clear public interest benefits of Crescomm's proposal, PAS strongly supports the Crescomm Petition and urges the Commission promptly to grant it.

Respectfully submitted,

PAN AMERICAN SATELLITE



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments of Pan American Satellite was served by United States first class mail, postage prepaid, this 10th day of April, 1992, on the following:

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