

LEOSAT
CORPORATION

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Federal Communications Commission
Office of the Secretary

Washington Park Office Building
1001 22nd St. N.W.
Washington, D.C. 20037-1817
Tel. 202/296-6104 Fax. 202/296-6142

May 15, 1992

Ms. Donna R. Searcy, Secretary
Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20054

Reference: Public Notice No. 92-443 in CC Docket No. 92-76

Dear Ms. Searcy,

Attached is the application of LEOSAT Corporation to serve as a member of the proposed Federal Advisory Committee to negotiate regulations concerning the small LEO's, those that would operate under 1 GHz.

An original and five(5) copies of the Application are provided.

Respectfully Submitted,



Joseph Roldan
President & CEO
LEOSAT Corporation

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Application for Advisory Committee Participation

Reference: Public Notice No. 92-443 CC Docket No. 92-76

In accordance with paragraph 11 of Public Notice no. 92-443, LEOSAT Corporation hereby applies for membership in the proposed Federal Advisory Committee now under consideration by the Federal Communications Commission. LEOSAT's response to the matters required by paragraph 11 of the Public Notice are set forth below and are lettered in accordance with that paragraph.

(a) Applicant Name:

LEOSAT, Corporation
1001 22nd St. N.W.
Washington, D.C. 20037

(b) LEOSAT Corporation is qualified to participate in the Federal Advisory Committee proposed by the Commission for the following reasons:

1. On May 4, 1992 LEOSAT submitted an Experimental License application for two low earth orbit satellites , one ground station, and several mobile units to the Office of Engineering and Technology.

LEOSAT

2. LEOSAT is requesting reconsideration of the Common Carrier Bureau's dismissal of its application to construct a Low Earth Orbit Satellite System FCC File No. 12-DSS-P-91(2). LEOSAT's petition will demonstrate that it met all established requirements for Low Earth Orbit applications and that it's application on file with the Commission as of September 21, 1990 meaningfully and concretely met the information required by the Commission.

(c) LEOSAT will, to the best of its abilities, participate actively in good faith in the development of the rules that are to be proposed by the Federal Advisory Committee.

(d) It is LEOSAT belief that the following organizations do not adequately represent LEOSAT's interest.

1. VITA is a not-for-profit organization whose interest in providing these services are for humanitarian reasons, rather than commercial. A commercial Corporation would have a greater incentive to promote spectrum sharing and new, efficient technologies that make more productive use of the radio spectrum.

2. ORBCOMM filed in response to the STARSYS application indicate that STARSYS represents the interests of the French Government, which cannot reasonably speak for the interest of a small US business before the Commission.

LEOSAT

3. ORBCOMM is proposing a modulation technique that is not as spectrum efficient as the one detailed by LEOSAT in its December 24, 1991 comments in response to the Commission's Notice of Proposed Rulemaking in ET Docket 91-280. LEOSAT will not be fairly represented in these proceedings if innovative, spectrum-efficient techniques are not considered for the little LEO-MSS applicants. Nor will the public interest be served if LEOSAT is not permitted to advise the Commission of its uniquely spectrum-efficient and market responsive design.

4. The Domestic Facilities Division, Common Carrier Bureau has dismissed LEOSAT's application on procedural grounds rather than considering its substance. It is the belief of LEOSAT's management that the Common Carrier Bureau is as yet unaware of LEOSAT's exclusive and innovative modulation coding scheme for channel management to utilize spectrum resources efficiently. Therefore, the Common Carrier Bureau and the Commission will be unable to consider LEOSAT's innovative proposals if LEOSAT is not permitted to participate in the Federal Advisory Committee on its own behalf.

I certify that I am the President & CEO of LEOSAT Corporation and am authorized to represent LEOSAT Corporation in this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Joseph Roldan', is written over a horizontal line. The signature is fluid and cursive, extending to the right beyond the line.

Joseph Roldan
President & CEO
LEOSAT Corporation