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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE

Federal Communications Commission

In the Matter of	)	
	)	
Amendment of Section 2.106 of the Commission's Rules to Allocate the 1610-1626.5 MHz and the 2483.5-2500 MHz Bands for Use by the Mobile-Satellite Service, Including Non-geostationary Satellites	)	ET Docket No. 92-28 RM-7771 PP-29 PP-32 RM-7773 PP-30 PP-33 RM-7805 PP-31 RM-7806

To the Commission:

ERRATUM TO CELSAT PETITION FOR RECONSIDERATION

CELSAT, Inc. hereby requests leave to file this Erratum to its Petition for Reconsideration filed in the above-captioned proceeding on October 5, 1992. Due to a collating error page 14 of the CELSAT Petition was inadvertently dropped from the original and 12 copies filed with the Commission. Original page 14 is attached hereto.

It is respectfully requested that this ERRATUM be accepted for filing and page 14 be included and considered with CELSAT's Petition as though it had been filed therewith.

Respectfully submitted,
CELSAT, Inc.

By: _____
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October 6, 1992

outcome because, in a shared environment further constrained by the GLONASS coordination requirement, CELSAT will not use "slices" or subbands from within this allocation for allegedly nonconforming terrestrial communications. Its ability to avoid doing so is not a change from its original configuration, but a function of its inherent and extraordinary flexibility. To the extent this ability to adapt might not have been immediately apparent from CELSAT's original submissions it was only because the full impact of the final outcome of WARC-92 could not, at the time, be fully discerned. (See, e.g., Consolidated Reply, p. 58.)

Thus, as to the specific issue of WARC-92 compatibility, CELSAT submits that, again -- perhaps due to a misunderstanding of CELSAT's mode of operation and adaptability -- the Commission was wrong to summarily cast CELSAT's HPCN aside because of a perceived incompatibility with the WARC re-allocation for this band.[15]

Finally, although action on this point is not necessarily needed at this time, to the extent the Commission perceives that an authorization of any incidental use of this band for HPCN terrestrial purposes over the U.S. would be inconsistent with the WARC-92 re-allocation, as the Commission has noted in the past it

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[15] As pointed out in its petition, CELSAT's proposed use of the requested spectrum will be in total compliance within the U.S. borders with all relevant international regulations, particularly with respect to power flux density limits. In contrast to the LEO systems and large beam GEO systems, CELSAT's very tight and controllable spot beams are well defined and individually tunable such that: (1) no cross-border power flux density or other interference concerns in possible violation of the WARC-92 requirements will occur; and (2) the threat of interference to radio astronomy locations can be precisely avoided.

Moreover, as discussed above and in Attachment B hereto, CELSAT can operate compatibly with the proposed LEO systems contemplated by WARC-92.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing ERRATUM has been served this date on counsel for all parties at the address shown on the attached service list by depositing the same in the U.S. Mail, First Class postage pre-paid.

Victor J. Toth

October 6, 1992

CERTIFICATE OF SERVICE

I, Victor J. Toth, hereby certify that a copy of the foregoing document was served by first-class mail, postage pre-paid, this 5th day of October,1992 on the following persons:

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