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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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

In the Matter of

<b>Amendment of Section 2.106 of the</b>	)	
<b>Commission's Rules to Allocate</b>	)	<b>ET Docket No. 95-18</b>
<b>Spectrum at 2 GHz for Use by the</b>	)	<b>RM-7927</b>
<b>Mobile-Satellite Service</b>	)	

To the Commission:

**DOCKET FILE COPY ORIGINAL**

**MOTION OF COMSAT CORPORATION  
FOR LEAVE TO FILE SUPPLEMENTAL COMMENTS**

COMSAT Corporation ("COMSAT"), through its COMSAT Mobile Communications business unit, submits this Motion requesting leave to file the attached "Supplemental Comments of COMSAT Corporation" in response to the Commission's Notice of Proposed Rule Making ("NPRM")<sup>1</sup> in this proceeding.

The purpose of the Supplemental Comments is to request that the FCC incorporate the results of the 1995 World Radiocommunications Conference ("WRC-95") into its proposals in this rule making. The decisions made at WRC-95 regarding the allocation of spectrum at 2 GHz for use by the global Mobile Satellite Services ("MSS") beginning on January 1, 2000, and the procedures for ensuring a gradual transition of terrestrial Fixed Services ("FS") from the 2 GHz band relate directly to, and significantly impact, issues under consideration in this proceeding.<sup>2</sup>

<sup>1</sup> Notice of Proposed Rule Making, ET Docket No. 95-18, 10 FCC Rcd 3230 (1995).

<sup>2</sup> See Final Acts of the World Radiocommunication Conference (WRC-95), Geneva 17 November 1995 ("WRC-95 Final Acts").

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Indeed, COMSAT believes that the results of WRC-95 fundamentally alter the assumptions underlying the Commission's proposals in the NPRM regarding the deployment of MSS at 2 GHz and the relocation and reimbursement of existing terrestrial operations in the 2 GHz MSS bands in the United States. In contrast to the FCC's proposals, the WRC-95 Final Acts recognize that MSS and existing FS microwave systems can share certain band segments at 2 GHz for a limited time as part of an overall transition plan for the 2 GHz band, and that procedures and coordination criteria can be devised, in accordance with internationally agreed-upon FS performance objectives, to protect existing FS microwave systems from harmful interference during the transition. We believe that the WRC-95 decisions provide a workable framework for the Commission to allocate spectrum at 2 GHz for use by MSS in the United States and that this framework, which is consistent with COMSAT's phased transition plan submitted to the FCC on May 5, 1995,<sup>3</sup> and clarified in the attached Supplemental Comments, should be adopted by the FCC.

In COMSAT's Supplemental Comments, we propose specific steps that the Commission should undertake to implement the results of WRC-95, consistent with our alternative transition plan for the 2 GHz band. Our proposals are intended to expedite resolution of the issues under consideration in this proceeding. To ensure that no party is prejudiced by the attached filing, we request

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<sup>3</sup> See Comments of COMSAT Corporation, filed May 5, 1995, at 17-24 ("COMSAT Comments").

that the FCC place our Supplemental Comments on public notice and seek comment from all interested parties on our proposals for allocating the 2 GHz band to MSS consistent with the results of WRC-95.

We believe that the steps set forth in the attached Supplemental Comments fulfill the Commission's objectives in this proceeding to bring the benefits of 2 GHz MSS technology to users throughout the United States and around the world as rapidly as possible and in a manner that fairly balances the interests of MSS and FS systems and promotes the delivery of new, competitive MSS services to the American public.

**CONCLUSION**

For the foregoing reasons, COMSAT respectfully submits that the Commission should accept the attached Supplemental Comments of COMSAT Corporation for filing in this proceeding.

Respectfully Submitted,

COMSAT CORPORATION  
COMSAT Mobile Communications

By:   
Nancy J. Thompson

COMSAT International Communications  
6560 Rock Spring Drive  
Bethesda, MD 20817  
(301) 214-3473

Its Attorney

March 14, 1996

CERTIFICATE OF SERVICE

I, Tina L. Oliver, hereby certify that the foregoing "Motion Of COMSAT Corporation for Leave to File Supplemental Comments" was served by hand delivery or first-class mail, postage prepaid, this 14th day of March, 1996 on the following persons:

Audrey L. Allison\*  
Attorney Advisor  
Satellite & Radiocommunication  
Division  
Federal Communications Commission  
2000 M Street, N.W.  
8th Floor  
Washington, D.C. 20554

Charles Iseman\*  
Chief, Sepectrum Policy Branch  
Office of Engineering and  
Techonology  
Federal Communications Commission  
2000 M Street, N.W.  
Room 424  
Washington, D.C. 20554

Bruce D. Jacobs  
Fisher Wayland Cooper Leader &  
Zaragoza, L.L.P.  
2001 Pennsylvania Avenue, N.W.,  
Suite 400  
Washington, D.C. 20006

Charles P. Featherstun  
1133 21st Street, N.W., Suite 900  
Washington, D.C. 20036

Bruce A. Franca \*  
Deputy Chief Engineer  
Office of Engineering and  
Technology  
Federal Communications Commission  
2000 M Street, N.W.  
Room 416  
Washington, D.C. 20554

Christopher D. Imlay  
Booth, Freret & Imlay  
1233 20th Street, Suite 204  
Washington, D.C. 20036

Cecily Holiday\*  
Deputy Chief  
Satellite & Radiocommunication  
Division  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W.  
8th Floor  
Washington, D.C. 20554

Damon C. Ladson \*  
Satellite & Radiocommunication  
Division  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W.  
8th Floor  
Washington, D.C. 20554

David C. Jatlow  
Young & Jatlow  
2300 N Street, N.W., Suite 600  
Washington, D.C. 20037

Donald H. Gips\*  
Deputy Chief  
Office of Plans and Policy  
Federal Communications Commission  
1919 M Street, N.W.  
Room 822  
Washington, D.C. 20554

Fatih Yurdal  
Chairman  
CEPT-JPT ERC/ECTRA MSS  
General Directorate of  
Radiocommunications  
Telsiz Genel Mudurlugu  
06510 - Emek/Ankara  
TURKEY

Gary M. Epstein  
Latham & Watkins  
1001 Pennsylvania Avenue, N.W.,  
Suite 1300  
Washington, D.C. 20004

George M. Kizer  
Telecommuciations  
Industry Association  
2500 Wilson Blvd., Suite 300  
Arlington, VA 22201

Gerald E. Oberst, Jr.  
Hogan & Hartson L.L.P.  
555 13th Street, N.W.  
Washington, D.C. 20004

Harry Ng\*  
Chief, Satellite Engineering  
Branch  
Satellite & Radiocommunication  
Division  
Federal Communications Commission  
2000 M Street, N.W.  
8th Floor  
Washington, D.C. 20554

Henry Goldberg  
Goldberg, Godles, Wiener & Wright  
1229 Nineteenth Street, N.W.  
Washington, D.C. 20036

J. R. Woodhull  
Logicon, Inc.  
3701 Skypark Drive  
Torrance, California 90505

James F. Lovette  
Apple Computer Inc.  
One Infinite Loop, MS: 301-4J  
Cupertino, CA 95014

James G. Ennis  
Iridium, Inc.  
1401 H Street, N.W.  
Washington, D.C. 20005

Jane Mago\*  
Sr. Legal Advisor to Commissioner  
Chong  
Federal Communications Commission  
1919 M Street, N.W.  
Room 844  
Washington, D.C. 20554

Jeffrey L. Sheldon  
UTC  
1140 Connecticut Avenue, N.W.  
Suite 1140  
Washington, D.C. 20036

James L. Ball\*  
Associate Bureau Chief  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W.  
Room 800  
Washington, D.C. 20554

John T. Scott, III  
Crowell & Moring  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

John F. X. Browne  
President  
Association of Federal  
Communications  
Consulting Engineers  
P.O. Box 19333  
20th Street Station  
Washington, D.C. 20036

John Gilsenan  
Foreign Affairs Officer  
EB/CIP  
Department of State  
2201 C Street, N.W.  
Room 2318  
Washington, D.C. 20520

Jonathan D. Blake  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, D.C. 20044

Julius Genachowski\*  
Legal Advisor to Chairman Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554

Katherine M. Holden  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Lawrence Petak\*  
Chief, New Technology Development  
Division  
Office of Engineering & Technology  
Federal Communications Commission  
2000 M Street, N.W.  
Suite 230  
Washington, D.C. 20554

Leslie A. Taylor  
Leslie Taylor Associates  
6800 Carlynn Court  
Bethesda, MD 20817

Lisa B. Smith\*  
Legal Advisor to Commissioner  
Barrett  
Federal Communications Commission  
1919 M Street, N.W.  
Room A26  
Washington, D.C. 20554

Lon C. Levin  
Vice President and Regulatory  
Counsel  
Personal Communications  
Satellite Corporation  
10802 Parkridge Boulevard  
Reston, Virginia 22091

Mark J. Golden  
Personal Communications Industry  
Association  
1019 19th Street, N.W., Suite 1100  
Washington, D.C. 20036

Mary McManus\*  
Legal Advisor to Commissioner Ness  
Federal Communications Commission  
1919 M Street, N.W.  
Room 832  
Washington, D.C. 20554

Michael D. Kennedy  
Motorola, Inc.  
1350 I Street, N.W.  
Washington, D.C. 20005

Michael Marcus\*  
Acting Chief  
Policy & Rules Division  
Office of Engineering & Technology  
Federal Communications Commission  
2000 M Street, N.W.  
Suite 480  
Washington, D.C. 20554

Norman P. Leventhal  
Leventhal, Senter & Lerman  
2000 K Street, N.W., Suite 600  
Washington, D.C. 20006

Olof Lundberg  
Chief Executive Officer  
I-CO Global Communications, Ltd.  
99 City Road  
London EC1Y, 1AX  
England, United Kingdom

Philip L. Malet  
Steptoe & Johnson  
1330 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Philip V. Otero  
GE American Communications, Inc.  
1750 Old Meadow Road  
McLean, VA 22101

Richard D. Parlow  
Associate Administrator  
Office of Spectrum Management  
NTIA  
U.S. Department of Commerce  
14th & Constitution Ave., N.W.  
Room 4099  
Washington, D.C. 20230

Richard M. Smith\*  
Chief, Office of Engineering and  
Technology  
Federal Communications Commission  
2000 M Street, N.W.  
Suite 480  
Washington, D.C. 20554

Robert A. Mazer  
Rosenman & Colin  
1300 19th Street, N.W., Suite 200  
Washington, D.C. 20005

Robert J. Miller  
Gardere & Wynne, L.L.P.  
1601 Elm Street  
3000 Thanksgiving Tower  
Dallas, TX 75201

Robert M. Gurss  
Wilkes, Artis, Hedrick & Lane,  
Chartered  
1666 K Street, N.W. #1100  
Washington, D.C. 20006

Rudy Baca  
Legal Advisor to Commissioner  
Quello  
Federal Communications Commission  
1919 M Street, N.W.  
Room 802  
Washington, D.C. 20554

Sam Antar  
Vice President  
Law & Regulation  
Capital Cities/ABC, Inc.  
77 West 66 Street  
New York, NY 10023

Scott B. Harris  
Chief  
International Bureau  
2000 M Street, N.W.  
Room 830  
Washington DC, 20554

Sean White\*  
Office of Engineering and  
Technology  
Federal Communications Commission  
2000 M Street, N.W.  
Suite 480  
Washington, D.C. 20554

Terri B. Natoli, Esq.  
Fleischman and Walsh, L.L.P.  
1400 Sixteenth Street, N.W.  
Washington, D.C. 20036

Thomas Tycz\*  
Chief  
Satellite & Radiocommunication  
Division  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W.  
8th Floor  
Washington, D.C. 20554

Thomas J. Keller  
Verner, Liipfert, Bernhard,  
McPherson  
and Hand, Chartered  
901 15th Street, N.W., Suite 700  
Washington, D.C. 20005

Thomas J. Casey  
Skadden, Arps, Slate, Meagher &  
Flom  
1440 New York Avenue, N.W.  
Washington, D.C. 20005

Thomas P. Stanley\*  
Office of Plans & Policy  
Federal Communications Commission  
1919 M Street, N.W.  
Room 838D  
Washington, D.C. 20554

Tom W. Davidson, P.C.  
Akin, Gump, Strauss, Hauer & Feld,  
L.L.P.  
1333 New Hampshire Avenue, N.W.  
Suite 400  
Washington, D.C. 20036

Victor Tawil  
Vice President  
Association for Maximum Service  
Television, Inc.  
1776 Massachusetts Avenue, N.W.,  
Suite 300  
Washington, D.C. 20036

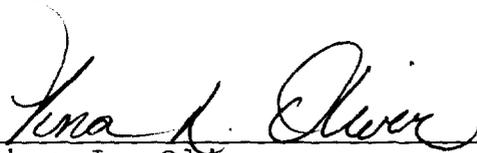
Warren Richards  
Foreign Affairs Officer  
EB/CIP  
Department of State  
2201 C Street, N.W.  
Room 2318  
Washington, D.C. 20520

Wayne Watts  
Southwestern Bell Mobile Systems,  
Inc.  
17330 Preston Road  
Suite 100A  
Dallas, TX 75252

Wayne V. Black  
Keller and Heckman  
1001 G Street, Suite 500 West  
Washington, D.C. 20001

William Luther\*  
Chief, Radiocommunication Policy  
Branch  
Satellite & Radiocommunication  
Division  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W.  
8th Floor  
Washington, D.C. 20554

William B. Barfield  
1155 Peachtree Street, N.E.  
Atlanta, Georgia 30309-3610

  
Tina L. Oliver