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BRUSSELS CORRESPONDENT OFFICE
44 AVENUE DES ARTS
BRUSSELS 1040 BELGIUM
TELEPHONE: 32-2-512-9890
TELEFAX: 32-2 502-1598

LEE J. TIEDRICH
DIRECT DIAL NUMBER
(202) 662-5403

March 19, 1996

MAR 19 1996

VIA MESSENGER

The Honorable William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: ET Docket No. 94-124
Amendment of Parts 2, 15, and 97 of the Commission's Rules to Permit Use of Radio Frequencies Above 40 GHz for New Radio Applications

Dear Mr. Caton:

On Monday March 18th, Sky Station International, Inc. ("Sky Station") met with Jane Mago, Senior Legal Advisor to Commissioner Chong, to discuss the authorization of a Global Stratospheric Telecommunications Service using spectrum proposed for millimeter wave operations in the above-referenced proceeding. The discussion focused on the issues outlined in the attached materials which were provided during the presentation. Please associate these materials with the above-referenced proceeding.

Any questions concerning this matter should be addressed to Paul Mahon of Mahon & Patusky at (202) 483-4000 or Lee J. Tiedrich of Covington & Burling at (202) 662-5403.

Sincerely,

Lee J. Tiedrich

LJT/djw
Attachment

cc: Jane Mago, Esq.

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List ABCDE

Sky Station International Inc.

Regulatory Briefing

Service Definition

GSTS:
Global Stratospheric Telecommunications Service

"a *Radiocommunications service* between *stratospheric stations* and any combination of *mobile stations* and *fixed stations*, with such service intended for capability of operation beyond the geographical limits of a country or continent."

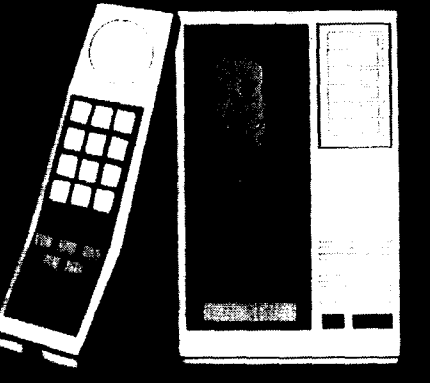
Stratospheric Station Definition

***Stratospheric Station*: A *station* located at a fixed position in the stratosphere**

Note: The stratosphere is that portion of the earth-space environment which is too high for air-dependant flight and too low for orbital maintenance; approximately 13-50 miles above the earth; above 99% of the breathable atmosphere.

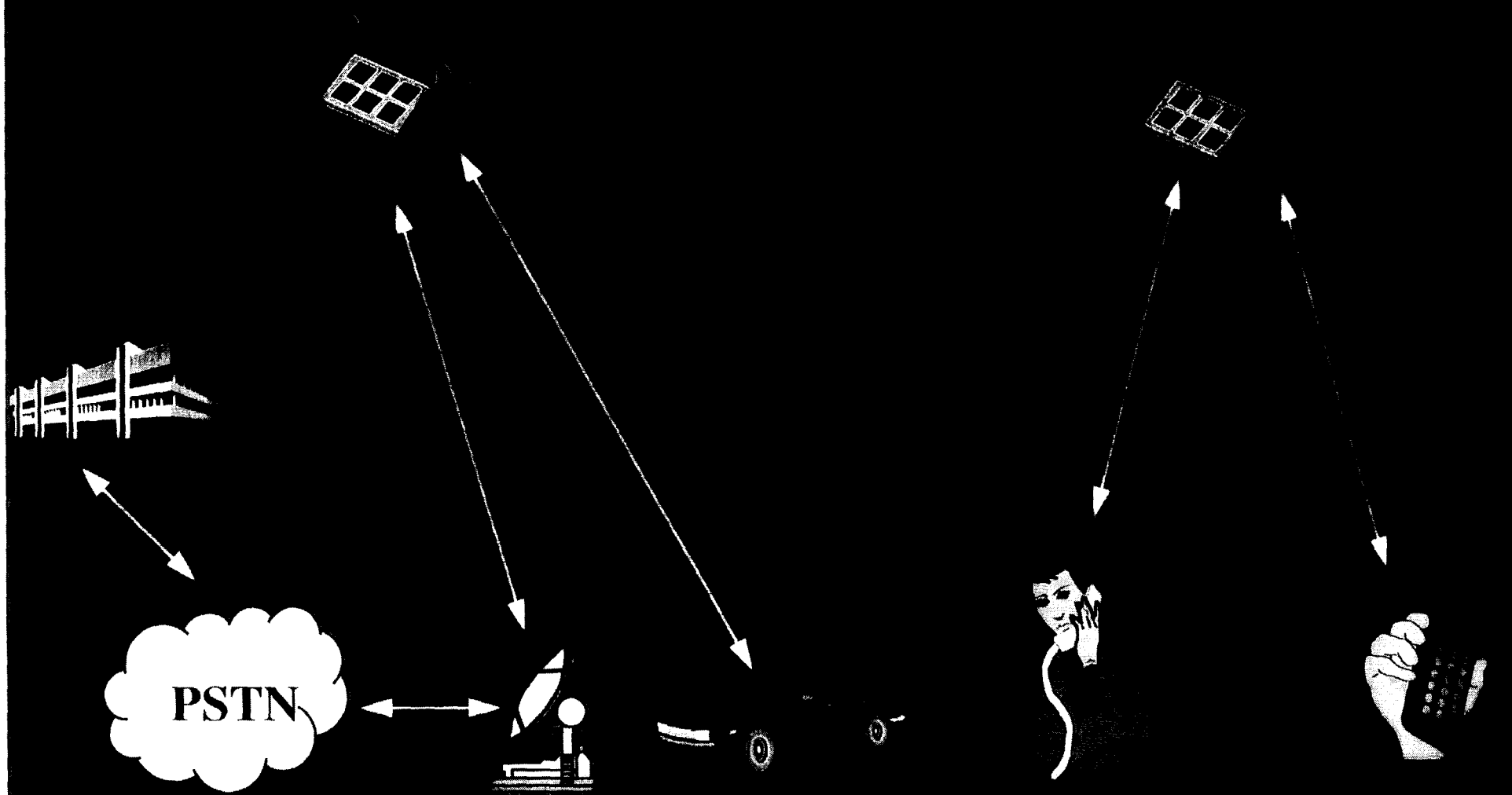
GSTS Applications

Global and fully portable 10¢/minute picturephone service, with capacity for > 1 billion users.



Global and fully portable 10¢/minute wireless world wide web connectivity, with capacity for > 1 billion users

GSTS Schematic



Markets and Competition Matrix

Mobility

Cost to user	High	Medium	Low
High	LEO MSS (eg Iridium)		Ka Band (eg Teledesic)
Medium		GSTS (eg Sky Station)	
Low	Cellular & PCS (eg Sprint Spectrum)		Fiber Optic (eg Cable)

Bandwidth to user

	Low	Medium	High

Global Coverage

Geography	all	
People	all	
Cities	all	

GSTS Billion Person Capacity for Broadband Portable Service

- 300 times user bandwidth (2,100 cells divided by 7 times reuse), divided by 70 KHz.
- At Bandwidth limit, assuming 50% used for base station and 9% guardband width
- 300 * 140 MHz/70 KHz = 600,000 Simultaneous Users = 6,000,000 Subscribers at 0.1 Erlang
- Nominally, Platform Capacity times 250 = 1.5 Billion Subscribers Worldwide.

Why Sky Stations Now?

- Stratospheric Platforms are old idea.
- New technology, using GPS, makes geostationary (Fixed location over earth) platforms practical
- New composite materials and electronics make long duration (10 years) and high capacity communications practical.
- Concepts like Iridium and Teledesic validated the Global Wireless market.

Sky Station International Inc. (SSI) Schedule

1999	2000	2001	2002	2003	2004
Launch [illegible] service	Launch N. Ames service	Launch Major [illegible]			
1%	20%	40%	60%	80%	90%

GSTS Complete

Coverage of world's population

GSTS Spectrum Requirements

47.2 - 47.5 GHz (Earth-to-Stratosphere)
47.9 - 48.2 GHz (Stratosphere-to-Earth)

Current Allocation: 47.2 - 50.2 GHz is allocated to Fixed, Mobile, Fixed Satellite (Earth-to-Space)

Proposed FCC Allocation: 47.2 - 48.2 GHz should be limited to licensed millimeter wave services

Our Proposal:

1. Revise footnotes 901 and US297 to limit use of required sub-bands to GSTS
2. Create rules for a GSTS

Frequency Allocation

GHz 47.2 - 50.2 International Allocation to Services

Region 1	Region 2	Region 3
47.2 - 50.2		
FIXED		
FIXED-SATELLITE (Earth-to-space) 901		
MOBILE 905		
904		

GHz 47.2 - 50.2 United States Allocation to Services

Government Allocation	Non-Government Allocation
FIXED	FIXED
FIXED-SATELLITE (Earth-to-space)	FIXED-SATELLITE (Earth-to-space)
MOBILE	MOBILE
US264, US297, 904	US264, US297, 904

Footnote 901 Language

"The allocation of the spectrum for the fixed-satellite service in the bands 42.5 - 43.5 GHz and 47.2 - 50.2 GHz for earth-to-space transmission is greater than that in the band 37.5 - 39.5 GHz for space-to-earth transmission in order to accomodate feeder links to broadcasting satellites. Administrations are urged to take all practical steps to reserve the band 47.2 - 49.2 GHz for feeder links for the broadcasting satellite service operating in the band 40.5 - 42.5 GHz".

Proposed Revised Footnote 901 Language

"Use of the bands 47.2 - 47.5 GHz (Earth-to- stratosphere) and 47.9 - 48.2 GHz (stratosphere-to-earth) by the fixed service and by the mobile service is limited to global stratospheric telecommunications service. Stations in the fixed-satellite service may be operated subject to not causing harmful interference to the global stratospheric telecommunications service.

. . .

Administrations are urged to take all practical steps to reserve the band 47.5 - 47.9 GHz and 48.2 - 49.2 GHz for feeder links for the broadcasting-satellite service operating in the band 40.5 - 42.5 GHz."

Footnote US297 Language

Current: "The bands 47.2 - 49.2 GHz and 74.0 - 75.5 GHz are also available for feeder links for the broadcasting satellite service."

Proposed: "Use of the bands 47.2 - 47.5 GHz (Earth-to-stratosphere) and 47.9 - 48.2 GHz (Stratosphere-to-earth) by the fixed service and by the mobile service is limited to global stratospheric telecommunications service. The bands 47.2 - 47.5 GHz, 47.5 - 47.9 GHz, 48.2 - 49.2 GHz and 74.0 75.5 GHz are also available for feeder links for the broadcasting-satellite service."

Why 47.2 - 47.5 GHz & 47.9 - 48.2 GHz ?

- 300 MHz in each direction is needed for a non mutually exclusive billion person mass-access (10¢/minute) service.
- Very high elevation angles of GSTS are compatible with the severe losses of the millimeter band.
- Least congested non-government band allocated to fixed and mobile service.
- Only impact is to reduce an unused FSS and BSS feeder-link band from 2000 MHz bandwidth to 1400 MHz bandwidth.

Proposed Rules for GSTS

- All technically, financially and legally qualified applicants authorized to launch with 300+300 MHz, but to power only a pro rata percentage of the bandwidth, after international coordination.
- Failure to meet construction and launch milestones forfeits bandwidth back to spectrum assignment pool.
- No mutual exclusivity.

Proposed Technical Qualifications

- Documentation of GSTS technology (e.g., ability to remain geostationary)
- Ability to provide coverage to at least 80% of world's population
- Engineering certifications

Proposed Legal/Financial Qualifications

- Cash in bank for first n sky stations.
- Meet foreign ownership limitations.
- Agreement to international coordination and national authorization constraints.

Example of Non-Exclusive Licensing Process

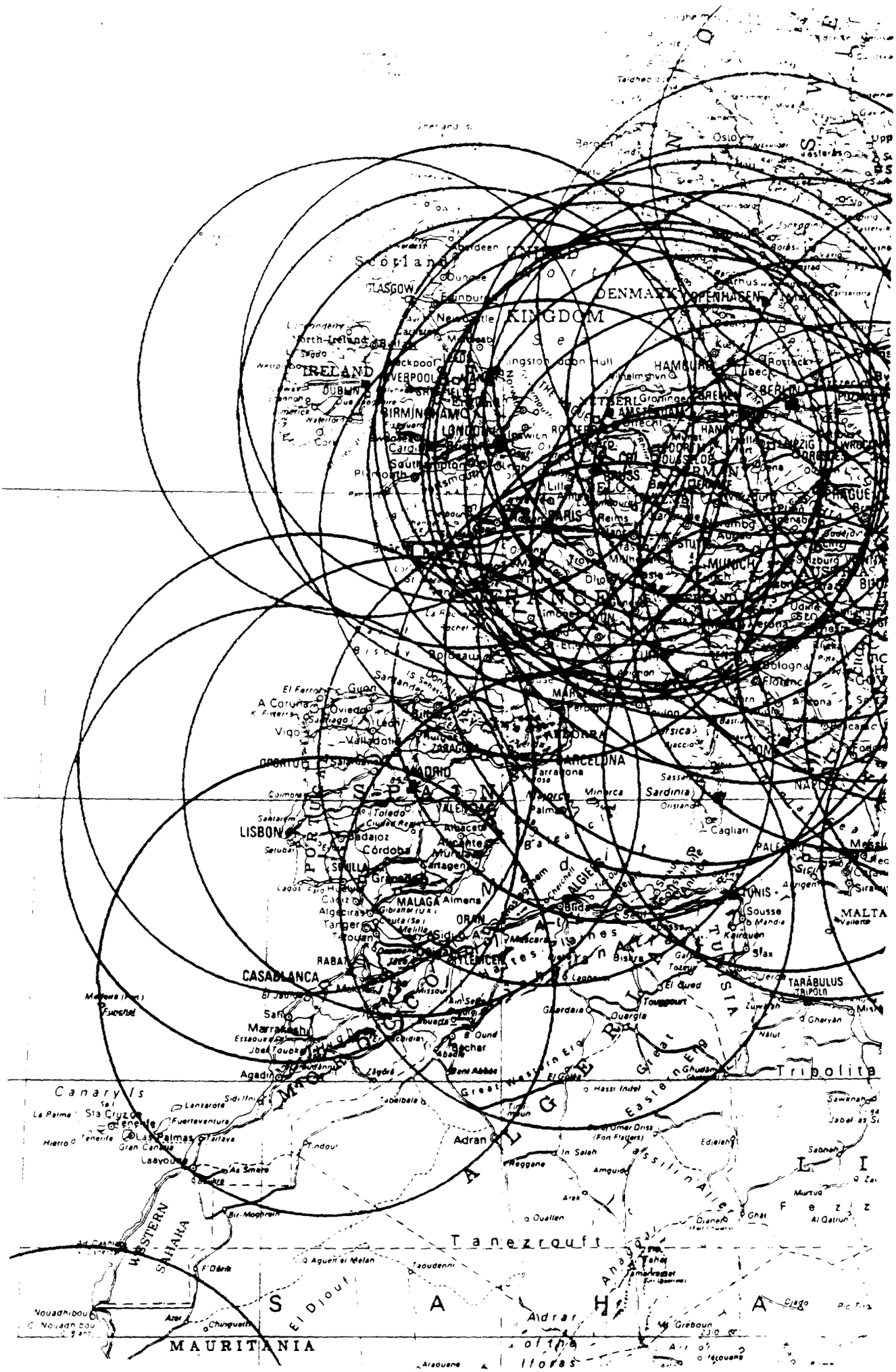
Assume $100 MM cash-in-bank requirement → Public notice for GSTS applications → 25 applications filed → 20 applications qualified → 200+200MH [illegible] → [illegible] MH per applicant [illegible] → 15 licensees don't meet milestones → 150+150 MHz reassigned pro rata to each of 5 licensees → 5 competing systems, each with 40+40 MHz → Global wideband portable service with billion person capability

Example of Non-Exclusive Licensing Process

Assume $100 MM cash in bank requirement → Public notice for GSTS applications → 25 applications filed → 25 applications [illegible] → [illegible] MHz [illegible] → [illegible] MHz [illegible] applicant assigned → 15 licensees don't meet milestones → 120+120 MHz reassigned pro rata to each of 10 licensees → 10 competing systems, each with 20+20 MHz → Global wideband portable service with billion person capability

Requested Government Actions

- Get GSTS definitions and revision of footnote 901 on the agenda for WRC-97.
- Issue NPRM to establish rules for a non-MX GSTS in the existing fixed/mobile allocation at 47 GHz, including revision of footnote US297.
- Authorize Sky Station International, Inc. to start constructing and operating a GSTS at its own risk (Experimental service in the DC-NY corridor).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