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April 3, 1996

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BY HAND

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

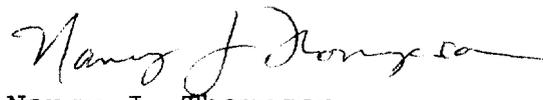
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OFFICE OF THE SECRETARY

Re: Ex Parte Contact in ET Docket No. 95-18

Dear Mr. Caton:

On Tuesday, April 2, 1996, representatives of COMSAT Corporation ("COMSAT"), ICO Global Communications ("ICO"), Hughes Electronics ("Hughes"), Celsat America Inc. ("Celsat"), and Personal Communications Satellite Corporation ("PCSAT") conducted a briefing for FCC staff in the Office of Engineering & Technology ("OET"). The parties representing COMSAT were John S. Hannon, Raymond Crowell, Jeffrey Binckes, Sam Nguyen and the undersigned. Also present were: Cheryl Tritt on behalf of ICO; Gary Epstein on behalf of Hughes; David Otten and Marc Martin for Celsat; and Bruce Jacobs for PCSAT. The participating FCC staff are identified below. The primary purpose of the briefing was to discuss COMSAT's Supplemental Comments filed in the above referenced docket on March 14, 1996, which request that the FCC incorporate the actions taken at WRC-95 into its decision in this proceeding. A copy of the briefing materials presented to OET is attached to the original and one copy of this letter filed with the Secretary.

Respectfully submitted,


Nancy J. Thompson

Attachment

cc: Mike Marcus
Lynn L. Remly
Charles Iseman
Rick Engelman
Fred Thomas
Sean White

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COMSAT'S PHASED TRANSITION PLAN FOR 2 GHz

APR - 3 1996

The key steps under COMSAT's phased transition plan to facilitate the introduction of 2 GHz MSS service in the United States by the year 2000 are as follows:

1. The Commission should immediately implement the Final Acts of WRC-95 regarding the spectrum allocations and dates of access for MSS so that the 1990-2025 MHz/2160-2200 MHz bands are allocated for MSS uplinks and downlinks, respectively, commencing January 1, 2000.
2. The results of WRC-95 and the information provided by COMSAT establish that terrestrial FS and MSS can share the band 2160-2200 MHz after January 1, 2000 in the U.S. as part of a long term transition plan. Thus, the FCC should implement MSS in the 2 GHz bands under a phased transition approach consistent with the results of WRC-95 by adopting COMSAT's alternative transition plan, as clarified herein.
3. To implement the transition, the Commission should impose a freeze on all new Broadcast Auxiliary Service (BAS) and FS licenses for the bands 1990-2025/2160-2200 MHz effective with the adoption of an Order in this proceeding.
4. In the MSS uplink, the BAS operators now occupying the 1990-2025 MHz band in the United States should be required to work with the MSS applicants to accommodate MSS operators in two phases:
 - a) Under phase 1, the BAS operators would vacate the 1990-2008 MHz band (BAS channel 1) by the year 2000. This could be accomplished with minimal impact on BAS by rechannelization of the BAS band, as described in COMSAT's alternative plan.
 - b) Under phase 2, the BAS operators would vacate the 2008-2025 MHz band (BAS channel 2) by the year 2005 through digitalization and/or relocation to other bands. However, after January 1, 2000, BAS operations in this band would become secondary to MSS and would be required to accommodate any MSS systems proposing to operate in this band before the year 2005. After January 1, 2005, BAS operations in this band would cease.

5. In the MSS downlink, the terrestrial FS operators now occupying on a primary basis the 2160-2200 MHz band in the United States would be required to negotiate sharing arrangements with MSS applicants proposing to use this band, or specific segments of the band, between the years 2000 and 2005 consistent with the results of WRC-95. After January 1, 2005, all FS operations in this band would cease; existing FS operations would migrate to other bands during the transition period.

6. In the MSS downlink specific coordination arrangements to share all, or certain portions, of the band should be determined by the FS/MSS operators before the end of 1996. The Commission should validate industry agreed guidelines, as necessary, to implement MSS/FS sharing at 2 GHz.