

Note•FThe•@text of this filing is the same as previous one . Header information has been corrected.

Comments of the Ministry of Posts and Telecommunications of Japan
on the Notice of Proposed Rule Making
to Implement the Global Mobile Personal Communications by
Satellite(GMPCS) Memorandum of Understanding and Arrangements
IB Docket No.99-67

The Ministry of Posts and Telecommunications of Japan hereby submits
the following comments in response to the Commission's Notice of Proposed
Rule Making("NPRM"(IB Docket No.99-67 and RM No.9165)).

1. With regards to Paragraph 20, we recognize usefulness of including in the scope of GMPCS terminals other portable terminals used in conjunction with Fixed Satellite Services, provided that they are used for transborder roaming. Satellite terminals used in a specific country, that are not used or planned for use in other countries, are not considered to be included in the scope of GMPCS-MoU. The reason is why the purpose of GMPCS MoU is to facilitate the global circulation and transborder roaming of GMPCS terminals. However, this topic could be considered within MRA frameworks (such as EC or APEC) if a satellite system operator wishes simply to facilitate the circulation of such equipment to his own country.

2. With regards to Paragraph 98, concerning distress and safety communications, we consider that this should be studied first in ITU-R. This is because the question of whether to require that GMPCS terminals have position location capabilities for distress, disaster, and safety communications must take into account both future technological development and existing terminals. It also is an issue not only within the United States, but also affects the worldwide system.