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BEFORE THE  
Federal Communications Commission  
WASHINGTON, D.C.

SEP 21 1999

In the Matter of )  
)  
Amendment of Part 2 of the Commission's )  
Rules to Allocate Additional Spectrum to )  
the Inter-Satellite, Fixed, and Mobile )  
Services and to Permit Unlicensed Devices )  
to Use Certain Segments in the 50.2-50.4 )  
GHz and 51.4-71.0 GHz Bands )

ET Docket No. 99-261

**COMMENTS OF LORAL SPACE & COMMUNICATIONS LTD.  
AND GLOBALSTAR, L.P.**

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**COMMENTS OF LORAL SPACE & COMMUNICATIONS LTD.  
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Loral Space & Communications Ltd. ("Loral") and Globalstar, L.P. ("Globalstar") file these comments in support of the Commission's proposal to amend the United States Table of Frequency Allocations to provide additional spectrum to the inter-satellite service ("ISS").<sup>1</sup> Loral and Globalstar endorse the exclusive allocation of six GHz of spectrum at 65 to 71 GHz for primary non-government ISS for GSO and NGSO systems in addition to the 3.85 GHz of primary ISS spectrum shared by government and commercial GSO users at 54.25-56.90 GHz and 57.0-58.2 GHz.

Loral has requested ISS utilization of the 65-71 GHz band for its CyberStar Ka-band system.<sup>2</sup> The Commission granted authorizations to Loral's CyberStar system in May 1997 in the

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<sup>1</sup> In the Matter of Amendment of Part 2 of the Commission's Rules to Allocate Additional Spectrum to the Inter-Satellite, Fixed, and Mobile Services and to Permit Unlicensed Devices to Use Certain Segments in the 50.2-50.4 GHz and 51.4-71.0 GHz Bands, ET Docket No. 99-261, *Notice of Proposed Rulemaking* (rel. July 23, 1999) ("NPRM"). ISS is also referred to as inter-satellite links ("ISLs").

<sup>2</sup> See Letter from Philip L. Verveer, Counsel for Loral, to Thomas S. Tycz, Chief, Satellite and Radiocommunications Division, International Bureau (Oct. 9, 1998).

first Ka-band processing round.<sup>3</sup> Loral, and several other Ka-band licensees, have requested authority for ISLs in order to provide essential connectivity to route traffic between the different satellites in their networks.<sup>4</sup> The Commission worked with NTIA to develop a U.S. proposal for the 1997 World Radiocommunication Conference ("WRC-97") in which the 65-71 GHz band would be allocated for ISLs for NGSO and GSO FSS systems. WRC-97 adopted the U.S. position and this NPRM seeks to implement this proposal domestically.

Globalstar has applied for authority to use ISLs with its proposed global satellite system operating at 2 GHz.<sup>5</sup> The proposed 2 GHz system includes a non-geostationary constellation of 64 satellites and four geostationary satellites. The ISLs would be used to connect disjointed portions of a service provider's areas of coverage by linking the GSO satellites with each other and with the NGSO constellation. Because Globalstar's application was filed prior to WRC-97, Globalstar originally sought ISLs in the existing non-government allocation at 59-64 GHz, a band which the NPRM proposes to modify for government only service. An allocation for non-

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<sup>3</sup> In re Application of Loral Space & Communications Ltd. for Authority to Construct, Launch and Operate a Ka-Band Satellite System in the Fixed-Satellite Service, Order and Authorization, 13 FCC Rcd. 1379 (1997).

<sup>4</sup> In re Rulemaking to Amend Parts 1, 2, 21, and 25 of the Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, to Reallocate the 29.5-30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Service, Third Report and Order, 12 FCC Rcd. 22310 at ¶ 51 (*citing* Ka-band applications of Loral, Echostar, Ka-Star, Lockheed Martin, Hughes, Comm, Inc. and Teledesic). Other first round licensees have filed subsequent requests for ISLs. See Application of PanAmSat Licensee Corp., SAT-MOD-19980522-00070 (filed May 21, 1998). In addition, the NPRM notes that there are pending applications for ISS spectrum on file from four applicants in the second Ka-band processing round (Directcom, Lockheed Martin, PanAmSat, and Pegasus) and from five applicants in the 40 GHz processing round (Lockheed Martin, Loral, Motorola, Orbital Sciences, and PanAmSat). NPRM at ¶ 5.

<sup>5</sup> See File Nos. 182-SAT-P/LA-97(64), 183-186-SAT-P/LA-97.

government ISLs would serve the purposes of Globalstar's ISL request sought in its 2 GHz application.

The allocations proposed by this NPRM will provide satellite licensees with the ISS spectrum they need to interconnect satellites within their respective networks. As noted by the Commission, there is a "well-established and pressing demand for commercial" ISL spectrum which "necessitates a substantial ISS allocation that can be used by all commercial satellite systems."<sup>6</sup> The use of ISLs will make Ka-band systems more efficient, resulting in the provision of more enhanced services like video telephony, medical and technical tele-imaging, high speed data networks and "bandwidth on demand" to consumers. In addition, other satellite systems, like Globalstar, will be able to provide more efficient interconnections between their service areas. The deployment of such services is endorsed by Section 706 of the Telecommunications Act of 1996, which "encourage(s) the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans. . . by utilizing. . . measures that promote competition in the local telecommunications market."<sup>7</sup>

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<sup>6</sup> NPRM at ¶ 9.

<sup>7</sup> NPRM at ¶ 2 (*citing* Pub.L. 104-104, Title VII, § 706, Feb. 8, 1996, 110 Stat. 153, reproduced in notes under 47 U.S.C. § 157).

Loral and Globalstar support the Commission's proposal to allocate the 65 -71 GHz band to the non-government ISS and believe that this allocation makes effective and efficient use of the radio spectrum and serves the public interest.

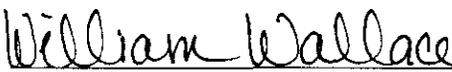
Respectfully submitted,

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