



American Mobile

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Lon C. Levin  
Vice President and  
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October 19, 1999

VIA HAND DELIVERY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
TW-B204  
Washington, D.C. 20554

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OCT 19 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *Ex Parte* Presentation  
File Nos. 47-SAT-WAIV-97; 548-SSA-97(50); 1281-DSE-P/L-96  
(Call Sign E960327); ITC-95-341; IB Docket No. 96-111, CC Docket  
No. 93-23, RM-7931; CC Docket No. 87-75; IB Docket No. 95-41/730-  
DSE-P/L-98; 647-DSE-P/L-98; 1217-SSA-98; SES-LIC-19990318-00435

Dear Ms. Salas:

The five North American L-band MSS system operators met October 4-8 for the third time this year and again failed to reach an agreement on a plan for coordinating L-band spectrum among themselves for the year 2000, when the current spectrum sharing agreement among the operators expires.

The recent meetings highlight the transparent fallacy of claims by TMI that it can provide service in the United States using spectrum that it has already coordinated and without any impact on the spectrum available to AMSC to provide U.S. domestic service. As of January 1, 2000, there is no spectrum sharing agreement among the five operators. Moreover, the proposals made at the meeting demonstrate that there is a shortage of MSS L-band spectrum and that meeting the demands of other system operators will reduce spectrum access for AMSC's system. There is also disagreement about key principles in the Mexico City Memorandum of Understanding relating both to what properly can be included in an operator's stated spectrum requirements and to the priority given to competing requirements when there is a shortage of available spectrum.

The pendency of the applications to use TMI's system for U.S. service may be entirely responsible for the current impasse. The pendency of these applications certainly makes this problem worse than it otherwise would be.

Ms. Magalie Roman Salas  
October 19, 1999  
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In a separate filing today, AMSC is submitting the Summary Record of the meetings, which contains confidential details of the operators' discussions and their specific proposals. TMI, as one of the operators that participated in the meetings, has these documents.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Lon C. Levin', with a stylized flourish at the end.

Lon C. Levin

Attachment

cc: Kathy Brown  
Robert Calaff  
Ari Fitzgerald  
Jennifer Gilsenan  
Linda Haller  
Fern Jarmulnek  
Adam Krinsky  
Peter Pappas  
Roderick Porter  
Ron Rapasi  
Mark Schneider  
Susan Steiman  
Peter Tenhula  
Cassandra Thomas  
Thomas Tycz



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Re: **SECTION 0.459 CONFIDENTIALITY REQUEST**  
The Extraordinary Procedures Meeting of GSO/MSS Operators  
Subject to the North American MOU Agreement, October 4-8, 1999;

Dear Ms. Salas:

During the week of October 4-8, 1999, AMSC Subsidiary Corporation ("AMSC") participated in special meetings with the Geostationary ("GSO") Mobile Satellite Service ("MSS") Operators subject to the North American Memorandum of Understanding ("MOU") and the 1999 Operating Agreement for Geostationary Mobile Satellite Systems Operating in the Bands 1525-1544/1545-1559 MHz and 1626.5-1645.5/1646.5-1660.5 MHz (the "Agreement").

AMSC hereby submits copies of the summary records of these meetings. AMSC requests confidential treatment of these materials. AMSC asks that, accordingly, the Commission withhold these summary records from public inspection under Section 0.459 of the Commission's rules and instead place this request for confidentiality in the public file for AMSC's authorized space station, AMSC-1.

If you have any questions concerning this matter, please contact the undersigned or Bruce

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D. Jacobs, Esq., of Fisher Wayland Cooper Leader & Zaragoza, L.L.P., at (202) 775-3543.

Very truly yours,



Lon C. Levin

cc: Tom Tycz

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