

ORIGINAL



Patricia Aileen Mahoney
Senior Counsel, Regulatory Matters

Tel: 1-202-326-5795

Fax: 1-202-408-3761

E-mail: patricia_mahoney@iridium.com

DOCKET FILE COPY ORIGINAL

September 24, 1997

RECEIVED

SEP 24 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Re: RM No. 9005

Dear Mr. Caton:

Transmitted herewith, on behalf of Iridium LLC, are an original and four (4) copies of its "Comments" in the above-referenced proceeding.

Should any questions arise concerning this matter, please contact the undersigned.

Very truly yours,

IRIDIUM LLC

A handwritten signature in cursive script that reads "Patricia A. Mahoney".

Patricia A. Mahoney
Senior Counsel, Regulatory Matters

024

FB

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20054

RECEIVED

SEP 24 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Routine Licensing of Large)
Numbers of Small Antenna Earth Stations)
Operating in the Ka-Band)

RM No. 9005

Directed to: The Commission

COMMENTS

Iridium LLC ("Iridium") hereby respectfully submits its comments in the above-referenced proceeding, in response to the Commission's Public Notice of September 5, 1997, IN Report No. 97-27 ("PN"), which requests comments to refresh the record on proposals for blanket licensing of satellite earth stations operating in the 17.7 - 20.2 GHz and 27.5 - 30.0 GHz frequency bands and sharing between fixed terrestrial and satellite services in the 17.7 - 19.7 GHz frequency bands.

On December 23, 1996, Lockheed Martin Corporation ("Lockheed Martin"), AT&T Corp. ("AT&T"), Hughes Communications, Inc. ("Hughes"), Loral Space & Communications, Inc. ("Loral"), and GE American Communications, Inc. ("GE") (collectively, the "Petitioners") submitted a Petition for Rulemaking ("Petition") in which they asked the Commission to initiate a rulemaking proceeding to revise Part 25 of the Commission's Rules (47 C.F.R. §25.101) in order to provide for the routine ("blanket") licensing of large numbers of small antenna earth stations

operating in the "28 GHz Band" or "Ka-Band" in the Geostationary Orbit/Fixed Satellite Service ("GSO/FSS").

The Commission has asked for comment on the appropriateness of instituting blanket licensing procedures for the bands identified in the Petition. While the PN appears to be asking for comment on the use of blanket licensing in the bands 19.7-20.2 GHz, 28.35-28.6 GHz, and 29.5-30.0 GHz, the PN generally seeks comments on the issues raised in the Petition. One of the bands specifically addressed in the Petition is the 29.25 - 29.5 GHz Band, which has been allocated in the U.S. on a co-primary basis both to GSO/FSS and to the Non-Geostationary Orbit/Mobile Satellite Service ("NGSO/MSS") for feederlink operations.

Iridium takes no position on the Petitioners' proposal generally and favors the use of industry meetings to develop interservice sharing rules and blanket licensing criteria. However, Iridium opposes the Petition insofar as it proposes the use of blanket licensing for GSO/FSS user terminals to be operated in the 29.25 - 29.5 GHz Band. Use of blanket licensing in this band would not be appropriate and would adversely affect the development of NGSO/MSS systems.

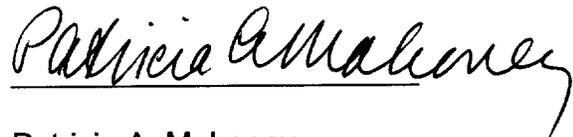
While the Petitioners have recognized an obligation to coordinate or demonstrate successful coordination with current NSGO/MSS licensees in the 29.25 - 29.5 GHz Band, the Petition is silent as to how coordination could be accomplished with any future NGSO/MSS system that intends or seeks to use 29.25 - 29.5 GHz for its feeder links. Indeed, coordination between co-primary NGSO/MSS feeder links and blanket-licensed GSO/FSS earth stations would

appear to be impossible. Thus, if the Commission permits blanket licensing of GSO/FSS terminals in this band, use of the band will not be feasible for NGSO/MSS feeder links, despite the co-primary status of NGSO/MSS feeder links with GSO/FSS.

Given the scarcity of spectrum for essential MSS feeder link operations, the Commission should not adopt a policy that will effectively preclude the use of this spectrum by future NGSO/MSS systems.

Respectfully submitted,

IRIDIUM LLC

A handwritten signature in cursive script that reads "Patricia A. Mahoney". The signature is written in black ink and is positioned above a horizontal line.

Patricia A. Mahoney
Senior Counsel, Regulatory Matters

IRIDIUM LLC
1575 Eye Street, NW Suite 800
Washington, DC 20005

202-408-3800

September 24, 1997

CERTIFICATE OF SERVICE

I, Kathleen Monahan, do hereby certify that copies of the foregoing Comments were sent by first class mail on this 24th day of September, 1997 to:

*Regina Keeney, Chief
International Bureau
Federal Communications Commission
2000 M Street, NW, Room 800
Washington, DC 20554

*Thomas S. Tycz, Chief
Satellite and Radiocommunication Division
Federal Communications Commission
2000 M Street, NW, Room 811
Washington, DC 20554

*Cecily C. Holiday, Deputy Chief
Satellite and Radiocommunication Division
Federal Communications Commission
2000 M Street, NW, Room 500
Washington, DC 20554

*Fern J. Jarmulnek, Chief
Satellite Policy Branch
Satellite and Radiocommunication Division
Federal Communications Commission
2000 M Street, NW, Room 500
Washington, DC 20554

*Steve Sharkey, Chief
Satellite Engineering Branch
Satellite and Radiocommunication Division
Federal Communications Commission
2000 M Street, NW, Room 500
Washington, DC 20554

*Chuck Magnuson
International Bureau
Federal Communications Commission
2000 M Street, NW, Room 800
Washington, DC 20554

*Hand Delivered

*Linda Dubroof
International Bureau
Federal Communications Commission
2000 M Street, NW, Room 800
Washington, DC 20554

Ray Bender, Esq.
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036
(Counsel for Lockheed Martin)

William K. Coulter, Esq.
Baker, Donelson, Bearman & Caldwell
Suite 800
801 Pennsylvania Avenue, NW
Washington, DC 20004
(Counsel for AT&T Corp.)

Gary M. Epstein, Esq.
John P. Janka, Esq.
Latham & Watkins
1001 Pennsylvania Avenue, NW
Washington, DC 20004
(Counsel for Hughes)

Mark A. Grannis, Esq.
Gibson, Dunn & Crutcher, LLP
1050 Connecticut Avenue, NW
Washington, DC 20036
(Counsel for Teledesic)

Philip L. Malet, Esq.
Steptoe & Johnson
1330 Connecticut Avenue, NW
Washington, DC 20036
(Counsel for Comm, Inc./Motorola)

Philip V. Otero
Vice President & General Counsel
GE American Communications
Four Research Way
Princeton, NJ 08540

*Hand Delivered

Philip L. Verveer, Esq.
Andrew R. D'Uva, Esq.
Willkie, Farr & Gallagher
1155 21st Street, NW
Washington, DC 20036
(Counsel for Loral)


Kathleen Monahan