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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Amendment of Section 2.106 )  
of the Commission's Rules to ) ET Docket No. 95-18  
Allocate Spectrum at 2 GHz for Use ) RM-7927  
by the Mobile-Satellite Service )

To: The Commission

COMMENTS ON COMSAT'S SUPPLEMENTAL COMMENTS

Pursuant to Section 1.415 of the Commission's Rules,<sup>1</sup> Alcatel Network Systems, Inc. ("Alcatel")<sup>2</sup> hereby comments on COMSAT Corporation's ("COMSAT") Supplemental Comments ("Supplemental Comments")<sup>3</sup> on the above-captioned Notice of Proposed Rule Making ("NPRM").<sup>4</sup>

<sup>1</sup>47 C.F.R. Section 1.415 (1996).

<sup>2</sup>Alcatel is a wholly-owned subsidiary of Alcatel Alsthom, one of the world's largest corporations (with annual sales in excess of \$30 billion) and the world's largest manufacturer and supplier of telecommunications equipment. In particular, Alcatel Alsthom is the world's largest independent manufacturer and supplier of microwave radios. Formerly Collins Radio and Rockwell International, Alcatel, with over \$750 million in annual sales, is a world leader in manufacturing microwave and light wave transmission systems. Alcatel's equipment is used for a wide range of services, including short, medium and long-haul voice, video and data transmission. Its microwave customers include all the Bell Operating Companies, most major independent telephone companies, cellular operators, power and other utility companies, oil companies, railroads, industrial companies, and state and local government agencies.

<sup>3</sup>In an April 17, 1996, Public Notice, the Commission solicited comments on COMSAT's Supplemental Comments. Public Notice, FCC Seeks Comments In the Proceeding to Allocate 70 Megahertz of Spectrum to the Mobile-Satellite Service (DA 96-577, released April 17, 1996). Several parties already have responded to COMSAT's Supplemental Comments: (i) on March 27, 1996, Motorola Satellite Communications, Inc. filed its Partial Opposition of Motorola to COMSAT's Motion for Leave to File Supplemental Comments; (ii) on April 1, 1996, UTC, the Telecommunications Association ("UTC"), filed the UTC Opposition to Motion ("UTC Opposition"); and (iii) on April 5, 1996, the American Petroleum Institute ("API") filed the Response of the American Petroleum Institute to Supplemental Comments of COMSAT Corporation ("API Response"). On April 11, 1996, COMSAT filed a Reply of COMSAT Corporation to Motorola and UTC ("COMSAT Reply").

<sup>4</sup>10 FCC Rcd 3230 (1995).

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The Commission has proposed reallocating additional spectrum from the 2 GHz band for the mobile-satellite service ("MSS").<sup>5</sup> One of the issues that must be resolved with respect to the NPRM is whether FS and MSS users could share a portion of the 2 GHz band for a limited period as part of the transition to implement this reallocation. COMSAT, in its Supplemental Comments, claims that, based upon international ITU-R standards, the 1995 World Radiocommunication Conference ("WRC-95") concluded that FS and MSS users could share the 2 GHz band on a co-primary basis.<sup>6</sup>

COMSAT's claim concerning decisions made at WRC-95 is unjustified. Reliance upon ITU-R, or upon other international sharing criteria, is inappropriate because there are material differences in performance characteristics between U.S. and international FS and MSS systems. Moreover, there is absolutely no evidence in the record of this proceeding that, based upon U.S. standards, FS/MSS 2 GHz band sharing is feasible.<sup>7</sup>

At a recent meeting convened by COMSAT,<sup>8</sup> MSS interests recognized the need to study sharing standards in the context of domestic operations. The FS and MSS interests attending this meeting agreed to cooperate in determining if appropriate system performance objectives and interference criteria could be developed to permit their 2 GHz band sharing. As detailed in the comments to be filed contemporaneously herewith by the Fixed Point-to-Point Communications

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<sup>5</sup>NPRM, 10 FCC Rcd at 3231-33.

<sup>6</sup>Supplemental Comments at 4-11.

<sup>7</sup>See UTC Opposition at 3; API Response at 3-6.

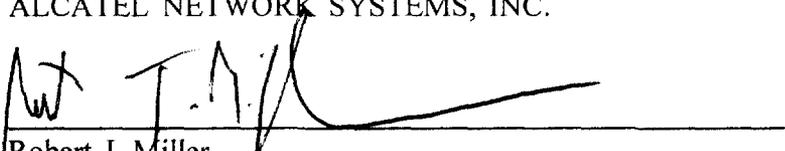
<sup>8</sup>This meeting took place April 25-26, 1996, at COMSAT Corporation in Bethesda, Maryland.

Section, Network Equipment Division of the Telecommunications Industry Association ("TIA"),<sup>9</sup> these parties intend to work with its TR14.11 committee in resolving these issues.

Consistent with the recent agreement between FS and MSS interests, TIA, in these comments, urges that the Commission rely upon TR14.11: (i) to establish appropriate criteria for determining whether FS paths could share the 2165-2200 MHz band with MSS users; and (ii) to establish appropriate channel plans and other technical restrictions on MSS users to protect FS users in the same band if such sharing were to occur. Furthermore, TIA recommends that the Commission defer any reallocation of the 2 GHz band for MSS until these issues are resolved satisfactorily. Given the serious questions concerning the feasibility of FS/MSS 2 GHz band sharing in the U.S., Alcatel totally supports the foregoing TIA recommendations.

Respectfully submitted,

ALCATEL NETWORK SYSTEMS, INC.



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May 16, 1996

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<sup>9</sup>TIA is the principal industry association representing fixed point-to-point microwave radio manufacturers. In June 1994, TIA's committee, TR14.11, completed its "Telecommunications Systems Bulletin No. 10-F, Interference Criteria for Microwave Systems," which prescribes standards for implementing the new channel plan for the bands above 3 GHz and for establishing criteria regarding 2 GHz band PCS-to-microwave interference protection. As part of its ongoing standard-setting process, TIA is updating Bulletin 10-F, and Bulletin 10-G is in draft. Alcatel is an active member of TIA and TR14.11, and it was represented at the April 1996 COMSAT meeting.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Comments on COMSAT's Supplemental Comments was sent via first class mail, postage prepaid, to the following parties on the 16th day of May, 1996:

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