



UNITED STATES DEPARTMENT OF COMMERCE  
National Telecommunications and  
Information Administration  
Washington, D.C. 20230

May 7, 1997

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Federal Communications Commission  
Office of Secretary

Mr. Peter Cowhey  
Chief, International Bureau  
Federal Communications Commission  
2000 M Street, NW Room 830  
Washington, D.C. 20554

Ref. IB Docket No. 96-220

We have received the enclosed correspondence from the Department of Defense and the National Oceanic and Atmospheric Administration concerning proposals that have been made to "timeshare" between meteorological satellite systems and NVNG MSS systems in the 400.15 to 401 MHz band. We believe that these are significant policy statements that need to be brought to your attention. As you probably are aware we have been briefed by Bureau staff and have been reading the various filings made concerning proposals for timesharing in this band. We are mindful of the lengthy negotiations among FCC staff and Government agencies that resulted in the proposal for timesharing that appeared in the NPRM in Docket 96-220. Changes to the proposed arrangement must, of course, be carefully considered.

Last week one of the NVNG applicants, Final Analysis, gave NTIA, DoD and Commerce representatives a briefing on its capabilities regarding timesharing. The attached correspondence was not available when we met with Final Analysis on this subject. Notwithstanding their stated serious objections, DoD and NOAA have assured us that they are continuing to consider the information provided addressing timesharing with multiple systems.

We understand your interest in bringing this proceeding to a close in the near future and will be working the various interests in to provide you with our views on this subject shortly. We would like not only a workable solution that protects DoD and NOAA systems but one that also achieves realistic NVNG MSS systems.

Sincerely,

Richard D. Parlow  
Associate Administrator,  
Spectrum Management

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how soon

Enclosures (2)

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DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS UNITED STATES AIR FORCE

MEMORANDUM FOR ADMINISTRATOR NTIA  
(ATTN: MR IRVING)

SUBJECT: Time Sharing of DMSP 400 MHz Channels

References: (a) FCC Notice of Proposed Rule Making (NPRM), FCC 96-426, IB Docket 96-220,  
29 October 1996

(b) Memorandum to Ms Ruth Milkman, RE: IB Docket No. 96-220: NVNG MSS Industry  
Band Plan, 11 April 1997

The Defense Meteorological Support Program (DMSP) and follow-on converged system are crucial to the national security and the lives of our warfighting men and women.

In the national interest, we <sup>in NPRM</sup> negotiated the spectrum-sharing conditions (Ref a) that will allow time sharing of the two DMSP downlink channels near 400 MHz with a single civil Mobile Satellite System (MSS) provider. The most important factor in our decision to accept the NPRM was that it clearly specified DMSP would have to time share spectrum with only one civil MSS provider. This and other sharing conditions greatly allayed our concerns over time delays in resolving potential operational electromagnetic interference situations.

On 11 April 1997, FCC received the Ref b memorandum from several MSS providers that proposes that more than one civil system time share DMSP downlink channels. We are very concerned with this proposal, given that the time sharing techniques outlined in the NPRM are not proven for even one provider, much less two. We anticipate that sharing with just one provider will be, at best, difficult.

Request that you convey our strong opposition to any decision that would allow more than one civil MSS provider to time share with DMSP 400 MHz downlink channels.

  
GREGORY S. MARTIN, Maj Gen, USAF  
Director of Operational Requirements  
DCS, Air & Space Operations

  
GEORGE P. LAMPE, Maj Gen, USAF  
Deputy Director, Communications  
and Information

cc: Chairman FCC, Mr Hundt ✓  
Assistant NTIA Administrator, Mr Parlow  
ASD/C3I, Mr Paige  
JCS/J6, LTG Buchholz  
HQDA DISC4, LTG Gunther  
CNO/N6, VAdm Cebrowski



UNITED STATES DEPARTMENT OF COMMERCE  
The Under Secretary for  
Oceans and Atmosphere  
Washington, D.C. 20230

MAY - 5 1997

The Honorable Larry Irving  
Assistant Secretary for Communications  
and Information  
National Telecommunications  
and Information Administration  
Department of Commerce  
Washington, D.C. 20230

Dear Larry:

As you know, the National Oceanic and Atmospheric Administration (NOAA) operates a number of meteorological satellites (METSAT) and meteorological aids (METAID) in several bands which provide data essential to weather forecasting. These weather forecasts, some of which are also provided by NOAA, are used for the prediction and tracking of severe storms, floods, freezing weather hazardous to crops and aviation, and in a number of other ways which protect the life and property of the public in the United States and worldwide. METSATS and METAIDS are operated by other countries in the same bands as are used by NOAA, and their data is likewise used in the United States.

Having reviewed recent proposals to timeshare primary METSAT and METAID bands with Little LEOs, I am concerned with the threat they pose to the integrity of our operations. Timesharing proposals surfaced only recently as a result of the FCC's need to supply more spectrum than it had for use by the Mobile Satellite Systems (MSS). The technique is not well understood. It has not been approved by ITU-R, having only recently been introduced into that forum, nor has sufficient study been conducted in the United States to provide confidence that timesharing will work without unacceptable interference to METSATS. I am also concerned about the continuing proposals to reallocate portions of the METAID bands to the MSS. Reallocation prior to the development and worldwide deployment of new METAID systems is not supported by sharing studies completed to date.

I therefore urge you to deny time shared access to multiple MSS systems in any METSAT band used by NOAA until such time as technical studies have been conducted, and approved by the international community through ITU-R, to show the concept is indeed workable.

Sincerely,

D. James Baker



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THE ADMINISTRATOR

