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

In the Matter of	)	
	)	
Allocation and Designation of Spectrum	)	IB Docket No. 97-95
for Fixed-Satellite Services	)	
in the 37.5-38.5 GHz, 40.5-41.5 GHz,	)	RM-8811
and 48.2-50.2 GHz Frequency Bands;	)	
Allocation of Spectrum to Upgrade Fixed	)	
and Mobile Allocations in the 40.5-42.5 GHz	)	
Frequency Band, Allocation of Spectrum	)	
in the 46.9-47.0 GHz Frequency Band for	)	
Wireless Services; and Allocation of	)	
Spectrum in the 37.0-38.0 GHz and	)	
40.0-40.5 GHz for Government Operations.	)	

REPLY COMMENTS

PanAmSat Corporation ("PanAmSat"), by its attorneys, hereby replies to the comments filed in response to the Notice of Proposed Rulemaking (the "NPRM") adopted in the above-referenced proceeding on March 13, 1997.

PanAmSat operates the world's largest private global fixed satellite network. It currently operates 14 satellites, and plans to launch seven additional satellites by late 1998. As a leading provider of satellite-based communications services and a long-standing innovator in the field of satellite communications, PanAmSat has a strong interest in the development of future spectrum resources for the fixed-satellite service ("FSS").

PanAmSat supports the comments filed by the Satellite Industry Association ("SIA") and joins SIA in urging the Commission to amend the band plan set forth in the NPRM in order to allocate adequate spectrum for next-generation FSS systems.

As the Commission has witnessed, as lower frequency bands have become saturated, satellite manufacturers and service providers have developed new technologies that permit them to exploit increasingly higher frequencies in order to enhance their offerings and introduce new services. Most recently, the effort by FSS

operators to expand into the Ka-band culminated in a series of International Bureau decisions licensing thirteen companies to launch and operate 73 Ka-band FSS satellites.

The expansion of FSS systems into the Ka-band is illustrative of what the Commission can expect to occur in the relatively near future with respect to the even higher frequencies at issue in this proceeding. In light of the International Bureau's recent Ka-band licensing decisions, relatively few Ka-band orbital assignments remain available for licensing. Once the Commission has issued licenses for these remaining slots, the 36.0-51.4 GHz band will be the only significant remaining spectrum resource available to accommodate future satellite services.

The NPRM, however, gives insufficient credence to the need for higher frequency FSS spectrum. The changes proposed in the NPRM would reduce the amount of spectrum available for FSS systems in the 36.0-51.4 GHz band, thereby hindering the future development of FSS systems and services. Such an outcome not only would harm U.S. satellite operators and users, but also would undermine the development of new low-cost, global broadband interactive services. The NPRM's band plan also would unduly favor terrestrial systems over FSS by allocating a larger share of the available spectrum for terrestrial wireless services.

For all of the above reasons, PanAmSat urges the Commission to revise its proposed allocation to provide more adequately for FSS systems and to divide the available spectrum more equitably between FSS and wireless terrestrial applications.

PanAmSat also joins SIA in urging the Commission not to implement any part of the NPRM's revised band plan until after WRC-97, in order to ensure that the international implications of the Commission's actions are fully considered and the opportunities to make common global FSS allocations are maximized.

Respectfully submitted,

PANAMSAT CORPORATION

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