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0480

September 11, 1997

**VIA HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, D.C. 20554

Re: RM No. 9147

Dear Mr. Caton:

On behalf of the Harris Corporation-Farinon Division ("Harris"), we are filing an original and four (4) copies of its Reply Comments in the above cited matter.

If there are any questions, do not hesitate to contact the undersigned.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, PLC



Leonard Robert Raish  
Counsel for Harris Corporation-Farinon  
Division

LRR:cej  
Enclosures

U.S. District Court  
District of Columbia  
014

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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COMMUNICATIONS SECTION

In the Matter of )
Amendment of Parts 2.106 and 25.202 )
of the Commission's Rules to Permit )
Operation of NGSO FSS Systems )
Co-Frequency with GSO and )
Terrestrial Systems in the )
10.7-12.7 GHz, 12.75-13.25 GHz, )
13.75-14.5 GHz, and 17.3-17.8 GHz )
Bands, and to Establish Technical Rules)
Governing NGSO FSS Operations )
in these Bands )

RM No. 9147

REPLY COMMENTS BY HARRIS CORPORATION- FARINON DIVISION

The Harris Corporation-Farinon Division ("Harris") through its attorneys, submits the Reply Comment below in the above captioned proceeding.

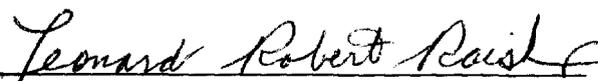
In its Comments, Harris pointed out the proposals for band sharing made by SkyBridge in its Petition for Rulemaking raise important issues that require in-depth study to avoid future spectrum management problems. The situation in the 11 GHz band is particularly acute due to the rapidly growing number of terrestrial fixed users in this band. Overall, it is the technical issues raised by the SkyBridge Petition that are of critical concern.

Harris participated in the drafting of the Reply Comments of the Fixed Point-to-Point Communications Section of the Telecommunications Industry Association ("TIA") and thus strongly supports those Comments.

Harris notes that it does not stand alone in its views that the Commission should require SkyBridge to provide a substantially more detailed analysis of the compatibility of its proposed NGSO system with all other users of the radio frequency bands involved. In one way or another, the great majority of commenters have expressed the same concerns as has Harris. Some commenters went even further and urged the Commission to dismiss the SkyBridge Petition outright or, in the case of the Broadcasting-Satellite interests, to exclude the 12.2-12.7 GHz band from any further consideration in this proceeding. Harris believes the concerns expressed by the Commenters referenced above are real. The Commission should not proceed to rulemaking until SkyBridge demonstrates that the sharing between NGSO systems and FS systems can, in fact, be accomplished.

Respectfully submitted

THE HARRIS CORPORATION-FARINON DIVISION

By:   
Leonard Robert Raish

Its Attorney

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Date: September 11, 1997

cej/lrr/r#5/Harris.PLEADING

## CERTIFICATE OF SERVICE

I, Chellestine Johnson, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that copies of the foregoing Reply Comments were sent this 11th day of September, 1997, by first-class United States mail, postage prepaid, to:

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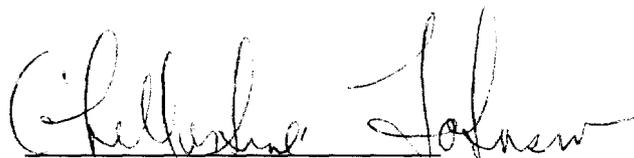
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A handwritten signature in black ink, appearing to read "Chellestine Johnson". The signature is written in a cursive style with a horizontal line underneath the name.

Chellestine Johnson