

ORIGINAL

DOCKET FILE COPY ORIGINAL

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

RECEIVED

JUL 27 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
VIRTUAL GEOSATELLITE, LLC )  
)  
Petition for Rulemaking to Make )  
Available C-band Spectrum for )  
Non-Geostationary Fixed-Satellite )  
Service Gateway Operations in the )  
United States )

RM-9650

REPLY COMMENTS OF GE AMERICAN COMMUNICATIONS, INC.

GE American Communications, Inc. ("GE Americom"), by its attorneys and pursuant to Section 1.405 of the Commission's rules, hereby submits its reply comments on the above-captioned Petition for Rulemaking of Virtual Geosatellite, LLC ("Virtual Geo Petition"). The record clearly demonstrates that any action on the Virtual Geo Petition would be premature.

In its initial comments, GE Americom emphasized that any rulemaking involving GSO/NGSO sharing in the C-band must take into account the high susceptibility of GSO FSS operations in the C-band to harmful interference, the need for the development of aggregate interference limits for NGSO FSS operations in the C-band, and the importance of enforceability measures regarding those limits. GE Americom Comments at 1-2. GE Americom also pointed out that although the feasibility of GSO/NGSO sharing is being studied internationally in

No. of Copies rec'd 014  
List A B C D E

the Ku- and Ka-bands, to date there has been no such examination of sharing in the C-band. *Id.* at 4.

Other commenters on the Virtual Geo Petition share GE Americom's concerns. PanAmSat agrees that GSO FSS operations in the C-band are more susceptible to harmful interference compared to similar operations at Ku-band. PanAmSat Comments and Conditional Opposition at 2. As a result, PanAmSat suggests that a broad inquiry into NGSO sharing in the C-band is not justified. PanAmSat also points out that because GSO FSS providers already share C-band spectrum with terrestrial microwave systems, any sharing analysis would have to consider the cumulative interference caused by all types of systems, not just NGSO FSS providers. *Id.*

Like PanAmSat, Comsat argues that detailed international study of GSO/NGSO sharing in the C-band is needed before the Commission can consider allowing NGSO use of the band. Comsat Comments at 1-3. Comsat suggests that rather than initiating an FCC proceeding to examine GSO/NGSO sharing in the C-band at this time, the issue should be delegated to the appropriate study group(s) at the ITU for analysis.

No party filed comments in support of the Virtual Geo Petition. Based on this record, the Commission must conclude that initiation of a rulemaking to explore GSO/NGSO sharing in the C-band is not justified at this time.

Respectfully submitted,

GE AMERICAN COMMUNICATIONS, INC.

By:



Peter A. Rohrbach

Karis A. Hastings

Yaron Dori

Hogan & Hartson, L.L.P.

555 Thirteenth Street, N.W.

Washington, D.C. 20004

(202) 637-5600

Its Attorneys

Philip V. Otero  
David J. Lidstone  
GE American Communications, Inc.  
Four Research Way  
Princeton, NJ 08540

July 27, 1999

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of GE American Communications, Inc. in RM-9650 was served by hand delivery (indicated by "\*\*") or U.S. First Class mail, this 27th day of July, 1999 on:

Donald Abelson, Chief\*  
International Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Roderick K. Porter, Deputy Chief \*  
International Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Thomas S. Tycz, Chief \*  
Satellite & Radiocommunication  
Division, International Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Harry Ng, Engineering Advisor \*  
Satellite & Radiocommunication  
Division, International Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Julie Garcia \*  
Satellite & Radiocommunication  
Division, International Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Julius Knapp, Chief \*  
Policy and Rules Division, Office of  
Engineering & Technology  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

International Transcription Service \*  
1231 20th Street, N.W.  
Washington, D.C. 20036

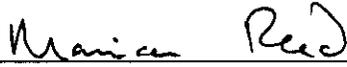
Raul R. Rodriguez  
Stephen D. Baruch  
David S. Keir  
Leventhal, Senter & Lerman P.L.L.C.  
2000 K Street, N.W., Suite 600  
Washington, D.C. 20006

Henry Goldberg  
Joseph A. Godles  
W. Kenneth Ferree  
Goldberg, Godles, Weiner & Wright  
1229 Nineteenth Street, N.W.  
Washington, D.C. 20036

Robert A. Mansbach  
Comsat Corporation  
6560 Rock Spring Drive  
Bethesda, MD 20817

Cara Maggioni  
Kurt Wimmer  
Covington & Burling  
1201 Pennsylvania Ave., N.W.  
Washington, D.C. 20044-7566

Wayne V. Black  
Peter A. Saari  
Keller and Heckman LLP  
1001 G Street, N.W., Suite 500 West  
Washington, D.C. 20001

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

---

Monica Reed