

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Part 2 of the Commission's)
Rules to Allocate Additional Spectrum to the)
Inter-Satellite, Fixed, and Mobile Services)
and to Permit Unlicensed Devices to Use)
Certain Segments in the 50.2-50.4 GHz and)
51.4-71.0 GHz Bands)

ET Docket No. 99-261

REPLY COMMENTS OF GE AMERICAN COMMUNICATIONS, INC.

GE American Communications, Inc. ("GE Americom"), by its attorneys, hereby submits its reply to the comments of other parties in response to the Notice of Proposed Rulemaking in the above-captioned proceeding, FCC 99-183 (rel. July 23, 1999) ("Notice"). GE Americom urges the Commission to adopt its proposals to allocate spectrum to the inter-satellite service ("ISS").

GE Americom holds a license to construct and operate the GE*Star system, a constellation of nine Ka-band satellites at five orbital locations, 1/ and has applied to modify that license by adding inter-satellite links ("ISLs"). 2/ GE Americom explained that adding ISLs would enhance the efficiency of its satellite system and facilitate global coverage by providing connectivity among the

1/ GE American Communications, Inc. Application for Authority to Construct, Launch and Operate a Ka-Band Satellite System in the Fixed-Satellite Service, DA 97-970 (Int'l Bur. rel. May 9, 1997).

2/ File No. 18-SAT-ML-98 (filed Nov. 18, 1997).

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system's spacecraft. In response to a Commission request, GE Americom identified specific frequency bands for ISLs for the GE*Star system. ^{3/} A number of other first round Ka-band licensees also propose to use ISLs, and applicants in the second Ka-band round, the 2 GHz round and the V-band round have pending ISL requests as well. See Notice at ¶ 5.

The Notice recognizes that “there is well-established and pressing demand for commercial inter-satellite link spectrum [that] necessitates a substantial ISS allocation that can be used by all commercial satellite systems.” *Id.* at ¶ 9. To meet this demand, the Commission proposes to allocate the 65-71 GHz band to non-government ISS and to permit shared government and non-government ISS use of the 54.25-56.90 GHz and 57.0-58.2 GHz bands. *Id.* at Table 2. To protect ISS operations in the 65-71 GHz band from harmful interference, the Commission proposes to adopt international footnotes S5.553 and S5.558. *Id.* at Appendix A. Finally, the Commission proposes to adopt international footnote S5.556A to ensure that ISS use of the 54.25-56.90 GHz, 57.0-58.2 GHz, and 59.0-59.3 GHz bands does not cause harmful interference to passive sensor reception. *Id.* at ¶ 10.

GE Americom urges the Commission to adopt its ISS allocation proposals, which received unanimous support from satellite licensees commenting on the Notice. ^{4/} As the Commission recognizes, the deployment of ISLs will allow

^{3/} See Letter of Karis A. Hastings to Thomas S. Tycz dated Oct. 9, 1998.

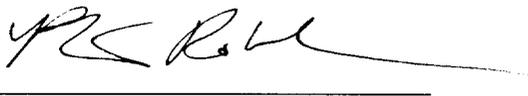
^{4/} See Comments of Lockheed Martin Corporation at 2; Comments of Loral Space & Communications Ltd. and Globalstar, L.P. at 1; Comments of KaStar Satellite Communications Corp., KaStarcom World Satellite, LLC and @Contact. LLC at 1.

Ka-band FSS licensees to inter-link their satellites, facilitating the delivery of innovative high-speed regional and global services. *Id.* at ¶ 2. GE Americom also agrees that the Commission should adopt the international footnotes referenced above to guard against harmful interference in the ISS bands.

For the foregoing reasons, the ISS allocation proposals set forth in the Notice should be adopted.

Respectfully submitted,

GE AMERICAN COMMUNICATIONS, INC.

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