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December 6, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Ex Parte Meeting of Northpoint Technology, Ltd.  
ET Docket No. 98-206, RM-9147, RM-9245,

Dear Ms. Salas:

In accordance with Section 1.1206 of the Commission's rules (47 CFR § 1.1206), I hereby notify you that on Friday, December 3, 1999, Sophia Collier and Chula Reynolds of Northpoint Technology, Ltd., Habib Riazzi of Lucent and Toni Cook Bush and I of this firm met with the following members of the Commission's International Bureau: Donald Abelson, Linda Haller, Harry Ng, Peter Pappas and Thomas Tycz. At the meeting, we discussed Northpoint's ability to share spectrum in the Ku-band with NGSO FSS systems. In this regard, the attached hand-out was distributed to all those present at the meeting.

An original and one copy of this letter are submitted for inclusion in the public record for the above-captioned proceedings. Please direct any questions concerning this submission to the undersigned.

Sincerely,

Brian Weimer  
Counsel for Northpoint Technology, Ltd.

- cc: Donald Abelson  
Linda Haller  
Harry Ng  
Peter Pappas  
Thomas Tycz

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## *Most NGSOs Are Compatible with Northpoint Exactly as Proposed*

- Five of the seven proposed NGSO systems can operate co-channel with Northpoint with no impairment to or from Northpoint
  - MEO systems: Boeing (2), Teledesic
  - HEO systems: Virgo, Denali
- No PFD limit changes are needed
- No on-going coordination is required
- Localized shielding of the Northpoint transmitter can make even rooftop co-location possible for four of the systems

## *Skybridge*

- Northpoint is sufficiently compatible with Skybridge and any other low elevation systems for mutually beneficial co-channel deployment
- Effective strategies exist for 100% coverage to be achieved
- If both are deployed in 12.2 - 12.7 GHz at the provisional PFD limits:
  - Northpoint retains 73 - 90% of its service area
    - 100% coverage achieved with additional cells
  - Skybridge retains 92% of its service area
    - 100% coverage achieved with using a combination of:
      - Satellite diversity during clear air (automatic feature already built-in to the Skybridge system)
      - Frequency diversity (ABA) during rain events

## *Northpoint and NGSO Co-Sharing Does Not Impair DBS*

- Taken together, the total increase in noise from the full deployment of NGSO (at current PFD limits) and Northpoint will not exceed the larger of:
  - 10% increase in DBS unavailability or
  - 5 minutes per month
- Northpoint's contribution to increased unavailability is significantly less than the NGSOs because Northpoint's average C/I ratio exceeds 41.6, a level at which the increase in DBS unavailability is less than .05%

## *Band Segmentation Strategy to Accommodate All NGSO*

- Eight NGSO systems have applied to operate in the 11.7 - 12.7 band
- Some of the systems are incompatible with one another; ITU study groups have determined that the Aggregate PFD limits can only accommodate 3 - 5 systems
- One solution is band segmentation which will also benefit Northpoint
  - 11.7 - 12.2: Lower elevations systems
  - 12.2 - 12.7: Higher elevation systems; Northpoint
- Benefit to the United States: Highest total spectrum capacity achieved