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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
)
 Proceeding to Address Satellite) RM-9740
 Network Unwanted Emissions)
)

REPLY COMMENTS OF COMSAT CORPORATION

COMSAT Corporation ("COMSAT") herein submits its Reply to the Comments filed with the Federal Communications Commission in the above-captioned proceeding, which addresses satellite network unwanted emissions.¹ COMSAT is the U.S. Signatory to INTELSAT and a major provider of services on the INTELSAT satellite system. COMSAT is also a supplier of new and innovative satellite networking technologies. COMSAT is very much interested in this proceeding, since its outcome could impact COMSAT's ability, and that of its customers, to provide the most cost-effective and efficient satellite services and products.

In its Reply, COMSAT requests the Commission to take particular note of those Comments that have emphasized the on-going work in the ITU Radiocommunication Sector Study Groups ("ITU-R") that directly bear on OOB emission limits.² As discussed in those Comments and below, we believe the Commission should wait for the

¹ *Proceeding to Address Satellite Network Unwanted Emissions*, DA 99-2601, RM-9740 (rel. November 19, 1999) ("Public Notice").

² See Comments of Hughes Space and Communications at 1; Globalstar, L.P. at 1-2; Boeing Company at 5; and Motorola Inc. at 1.

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ITU-R to complete its work before the Commission modifies Section 25.202(f) of its Rules.

The U.S. satellite industry, the Commission and other U.S. Government agencies are active in ITU-R study efforts through the well-established U.S. preparatory process for developing proposals and positions to the relevant study groups. The extensive analysis developed in the ITU process will provide valuable information for a Commission rulemaking addressing satellite network unwanted emissions.³

There are obvious benefits to be gained from waiting to see the results of the ITU-R work and any Recommendations adopted at the global level, given the real probability that results from the ITU-R will be available in a few months. Indeed, it would be premature and counterproductive to seek comments now on specific changes to Section 25.202(f) of the Commission's Rules when ITU-R Recommendations should be available shortly. By waiting for the ITU Recommendations, the Commission will be able to consider adopting the Recommendations as Commission rules. Alternatively, the Commission will be free to propose rules that vary from those adopted at the ITU-R, if such action is found to be warranted as a result of the Commission's rulemaking process. No party will be prejudiced if the Commission waits a few months before the initiation of a rulemaking that would seek specific proposed rule changes.

³ See Comments of Hughes Space and Communications at 2 and Comments of Globalstar, L.P. at 2.

COMSAT also believes that the Commission should establish an informal industry/government working group to recommend specific OOB emission limits, as suggested by Lockheed Martin and Motorola.⁴ Such an informal group could take note of the input from the U.S. process to the ITU-R study groups and working parties and also take into account any output from the ITU-R groups.

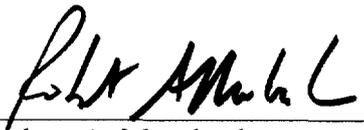
The informal group would provide a focal point for all interested parties in the U.S. to participate in developing emission levels that promote efficient use of the spectrum and foster advances in satellite technology. The results of the informal group would, in turn, be provided to the Commission for consideration and in the proposed rulemaking. This could well expedite the process and be a valuable aid to the Commission and the industry.

In conclusion, COMSAT supports the proposal for a proceeding to address satellite network unwanted emissions. The public interest requires the development and implementation of unwanted emission rules that accommodate existing and developing technologies but which do not inhibit future innovation in satellite communications.⁵ COMSAT believes that the public interest would be best served by establishing an informal industry/government working group to address these issues and

⁴ See Comments of Lockheed Martin Corporation at 1 and Comments of Motorola, Inc. at 2. It is worth noting that whereas spurious emissions specifications (e.g. harmonics, intermodulation, LO frequencies, etc.) have been incorporated into the Radio Regulations, the OOB specifications to be developed (i.e. those due to the modulation process) are intended only as an ITU-R Recommendation.

to proceed in a manner that permits consideration of expected ITU-R Recommendations.

Respectfully submitted,
COMSAT CORPORATION

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January 19, 2000

⁵ See Comments of Astrolink International at 2.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of COMSAT Corporation were mailed this 19th day of January 2000 to the following, via first class mail, postage pre-paid:

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A handwritten signature in black ink, appearing to read "R. A. Mansbach", written over a horizontal line.

Robert A. Mansbach