

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

In the Matter of)
)
Petition for Rulemaking to)
Amend Part 25 of the)
Commission's Rules to Update)
Out-of-Band Emissions From)
Satellite Networks)
_____)

RM-9740

RECEIVED
JAN 20 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS OF GLOBALSTAR, L.P.

Pursuant to Section 1.405 of the Commission's Rules, Globalstar, L.P., submits this "Reply" to the comments filed regarding the above-referenced "Petition for Rulemaking" to modify the out-of-band emissions limits in Section 25.202(f) (47 C.F.R. § 25.202(f)).

In its comments, Globalstar recommended that the Commission not pursue further proceedings on this Petition until Working Parties 4A, 8D and 10-11S and Task Group 1/5 of the International Telecommunication Union-Radiocommunication Sector ("ITU-R") complete ongoing discussions and analyses that are designed to develop recommendations for out-of-band emissions limits for satellite networks. Several parties echoed this view.

For example, one of the petitioners, Hughes Space and Communications, stated that

[T]he most expeditious way to proceed would be to continue work in the U.S. under the auspices of the

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

0/4

preparatory process for the relevant ITU-R study groups. This would maintain the focus on developing a U.S. position in the ITU-R. The Commission could then commence an NPRM after the 2000 ITU-R Radiocommunication Assembly, taking into account any approved recommendations as well as comments from the U.S. satellite industry.

Hughes Comments, at 2.

CCI International agreed, noting that low earth orbit satellite systems are global in nature, and that the ITU-R and United States standards should be consistent. As CCI stated:

[I]t would be preferable for only one standard to be applicable to such systems. . . . Moreover, it would be premature for the Commission to begin any rulemaking proceeding to modify its current out-of-band emission limits in Section 25.202(f) until after the WRC-2000 is concluded and the final version of the applicable ITU Radio Regulations are known.

CCI Comments, at 4-5.

Globalstar again urges the Commission not to initiate any rulemaking proceeding to modify Section 25.202(f) until the ITU-R has published its recommendations. Such recommendations will form a necessary basis for any rules adopted for satellite systems operating in the United States, and further proceedings at the Commission should be held in abeyance until those recommendations are available.

Globalstar believes that the same principle applies to the creation of an informal industry working group in the United States, as recommended by Motorola (Comments, at 2) and others. Globalstar would certainly

participate in such a working group. However, a U.S. industry working group would be most productive after the ITU-R task groups and working parties (TG 1/5, WP 4A, 8D and JWP 10-11S) that are currently working on the out-of-band emission standards have finished their meetings for this year. These meetings should conclude for this year approximately by the end of October 2000. That would be an appropriate time to review the progress of the ITU-R groups and to determine whether and what further proceedings may be needed.

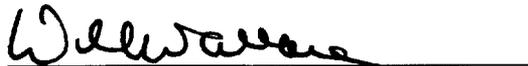
Accordingly, Globalstar urges the Commission not to proceed further with the issues raised in the Petition for Rulemaking until the ITU-R has published its recommended emissions masks for Satellite Services out-of-band emissions. If it seems appropriate at the time, an informal industry group could be formed to initiate review of these issues in the United States at the end of the ITU-R meeting cycle for the year 2000.

Respectfully submitted,

GLOBALSTAR, L.P.

Of Counsel:

William F. Adler
Vice President, Legal and
Regulatory Affairs
Globalstar, L.P.
3200 Zanker Road
San Jose, CA 95134
(408) 933-4401


William D. Wallace

CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington D.C. 20004
(202) 624-2500

Its Attorneys

Date: January 20, 2000

CERTIFICATE OF SERVICE

I, William D. Wallace, hereby certify that I have on this 20th day of January, 2000, caused to be served true and correct copies of the foregoing "Reply Comments of Globalstar, L.P." upon the following parties via hand delivery (marked with an asterisk(*)), or by first-class United States mail, postage prepaid, upon:

Donald Abelson, Chief*
International Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-C734
Washington, D.C. 20554

Thomas S. Tycz, Division Chief*
Satellite & Radiocommunication Division
International Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-A665
Washington, D.C. 20554

Fern J. Jarmulnek*
International Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-A523
Washington, D.C. 20554

Karl Kensinger*
International Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-A663
Washington, D.C. 20554

Harold Ng, Engineering Advisor*
International Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-A668
Washington, D.C. 20554

Alex Roytblat*
International Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-A623
Washington, D.C. 20554

William A. Luther*
International Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7-B454
Washington, DC 20554

Ron Repasi*
International Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-A505
Washington, DC 20554

William Hatch
National Telecommunications &
Information Administration
Department of Commerce
14th Street & Constitution Avenue, N.W.
Washington, DC 20230

Rob Haines
National Telecommunications &
Information Administration
Department of Commerce
14th Street & Constitution Avenue, N.W.
Washington, DC 20230

Philip L. Malet
James M. Talens
Steptoe & Johnson LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036

Mark A. Grannis
Evan R. Grayer
Harris Wiltshire & Grannis LLP
1200 Eighteenth Street, N.W.
Washington, DC 20036

Ronald C. Maehl
Hughes Space & Communications
Company
P.O. Box 92919
Los Angeles, CA 90009-2919

Robert A. Mazer
Albert Shuldiner
Vinson & Elkins L.L.P.
1455 Pennsylvania Avenue, N.W.
Washington, DC 20004-1008

Jose Albuquerque
Charles Bucher
Tom Walsh
c/o Jansky/Barmat Telecommunications
1120 19th Street, N.W., Suite 333
Washington, DC 20036

Allen Yang*
International Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7-B455
Washington, DC 20554



William D. Wallace