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March 8, 2000

BY HAND DELIVERY

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12th Street, S.W. TW-A325  
Washington, D.C. 20554

RECEIVED  
MAR 08 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: **Ex Parte Presentation: Redesignation of the  
17.7-19.7 GHz Frequency Band  
IB Docket No. 98-172**

Dear Ms. Salas:

Enclosed pursuant to 47 C.F.R. § 1.1206(b) are an original and two copies of two proposals regarding issues raised in the above-referenced proceeding. The proposals were developed by a group of Ka-band satellite licensees and applicants<sup>1</sup> and have been discussed with representatives of terrestrial fixed service interests in a series of meetings. We anticipate that there will be further discussion of the proposals at the meeting with Commission staff that is scheduled for this Friday.

<sup>1</sup> The group includes the following companies: Astrolink International, GE Americom, Hughes, iSky, Lockheed Martin, Loral, Motorola, NetSat 28, and TRW.

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Ms. Magalie R. Salas, Secretary  
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Please address any questions regarding this matter to the undersigned.

Very truly yours,



Karis A. Hastings  
Counsel for GE American  
Communications, Inc.

Enclosures

cc: Ari Fitzgerald, Legal Advisor to Chairman Kennard  
Mark Schneider, Senior Legal Advisor to Commissioner Ness  
Bryan Tramont, Legal Advisor to Commissioner Furchtgott-Roth  
Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell  
Adam Krinsky, Legal Advisor to Commissioner Tristani  
Peter Pappas, Associate Chief, International Bureau  
Rick Engelman, Chief, Planning & Negotiations Div., International Bureau  
Julius Knapp, Chief, Policy & Rules Div., Office of Engineering & Technology

# FSS COMPROMISE PROPOSAL (2/25/00)

- Provide 250 MHz of unshared GSO FSS spectrum at 18.3 - 18.8 GHz
- Swap exclusive GSO FSS primary band from 18.3-18.55 GHz to 18.55-18.8 GHz
- Raise existing PFD limit in the 18.6-18.8 GHz band
- Make 12 GHz available for PCO operations – full advocacy support by FSS Coalition
- One-way analog licensing of FS at 18.55-18.58 GHz continues until sunset date (no FS digital or two-way)
- FS operations in the 30 MHz become secondary on the later of (i) 2004 or (ii) 6 months from the successful launch of a GSO FSS satellite using those frequencies in the US
- FS operations cease in the 30 MHz by 2007
- Per NPRM, co-primary satellite earth station licensing (18.3 - 18.55 GHz) should proceed pursuant to Section 25.203

# FSS COMPROMISE PROPOSAL #2 (3/2/00)

## A GSO FSS Requirements

- 250 MHz of unshared GSO FSS spectrum and 250 MHz of co-primary GSO FSS spectrum between 18.3 - 18.8 GHz
  - GSO FSS unshared band at 18.55 - 18.8 GHz
  - GSO FSS co-primary band at 18.3 - 18.55 GHz
- Raise existing PFD limit in the 18.6-18.8 GHz band
- Per NPRM, co-primary satellite earth station licensing (18.3 - 18.55 GHz) should proceed pursuant to Section 25.203

## B 40 MHz Frequency Shift for PCOs to Maintain 440 MHz Band

- **Introduction:** We understand from the FCC that 19.26 - 19.3 GHz will likely be unavailable for FS use (other than grandfathered systems) after the release of the R&O. This creates an “orphaned” 40 MHz band at 17.7 - 17.74, which may provide an opportunity for the PCOs to be accommodated and to expand in the 18.10 - 18.55 MHz band.

# FSS COMPROMISE PROPOSAL #2 (CON'T)

## **B 40 MHz Frequency Shift for PCOs to Maintain 440 MHz Band (con't)**

### **Specifics:**

- Rechannelize 17.7 - 18.10 and 19.3 - 19.7 GHz bands for fixed point-to-point systems
  - Already required due to primary designation of NGSO at 19.26 - 19.3 GHz
  - Rechannelization was proposed by TIA Fixed Section in NPRM Comments
- New and modified point-to-point systems must use new channelization upon issuance of R&O; grandfathered systems may continue to use old channelization until sunset in R&O
- PCOs can use 18.10 - 18.55 GHz upon issuance of R&O if coordinable (either technically or as a business matter) with grandfathered point-to-point users in 18.10 - 18.14 GHz
  - Additional 10 MHz of spectrum available for PCOs
  - However, PCOs can't use both 18.10 - 18.14 GHz and 18.55 - 18.58 GHz
- FSS reaches mutual agreements for retuning on a case by case basis as FSS operators deploy in 18.55 - 18.58 GHz
  - Agreements with PCOs for 40 MHz shift
  - Agreements with affected FS point-to-point operators in 18.10 - 18.14 GHz