

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

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In the Matter of )

Amendment of Section 101.145 of the Commission's Rules )  
Regarding Interference To Geostationary Satellites )  
from Point-to-Point Terrestrial Microwave Stations )

RM 98-30

RECEIVED

APR 24 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

REPLY COMMENTS OF PANAMSAT CORPORATION

PanAmSat Corporation ("PanAmSat") hereby replies to the comments regarding the above-captioned petition for rulemaking (the "Petition") filed by Edwards and Kelcey, Inc.

The Petition asks that the Commission modify Section 101.145(b) of its terrestrial fixed-service ("FS") licensing rules. At present, the rule prohibits FS licensees operating directional transmitting antennas in the bands 2655 to 2690 MHz and 5925 to 6875 MHz from pointing within two degrees of the geostationary satellite arc absent "unusual circumstances." If there are "unusual circumstances," then an FS applicant may seek a waiver if: (i) "there is no reasonable alternative to the transmission path proposed"; (ii) there is "no evidence" that a waiver would "cause possible harmful interference to an authorized satellite system"; and (iii) and the operations will not exceed the EIRP limits already set forth in Section 101.145.

The Petition proposes that FS directional antennas operating in these bands be permitted to point within two degrees of the geostationary arc on a routine basis if the EIRP limits of Section 101.145 are complied with, without regard to whether there are reasonable alternatives to the proposed transmission path or evidence of possible harmful interference. PanAmSat is concerned that, in practice, the proposed rule change would have a deleterious effect on sharing these bands between terrestrial and space-based systems.

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First, although several parties have noted that the waiver requirement adds processing time to FS applications, the conversion to automated processing systems and the Commission's streamlining efforts are dramatically reducing the time that applications remain pending at the FCC. The costs, therefore, of retaining the waiver requirement appear to be shrinking and may soon be negligible.

Second, it is difficult at this time to predict the impact of the proposed changes on new satellite systems. As Comsat notes in its petition, "new communications satellite systems have better sensitivity than their predecessors, allowing higher transponder gains. Thus a given interferer will have greater effect on services being implemented on these new satellites."<sup>1</sup> PanAmSat agrees and would add that, although the impact of the rule change on wideband or saturated analog carriers in the fixed satellite service ("FSS") may not be significant, the same is not true for narrowband digital carriers in the FSS, where the uplink EIRP may be in the low 40s (dBW). With satellite customers increasingly using their transponders in a multi-carrier mode with narrowband digital carriers, the potential for interference may be more significant than suggested by some of the commenting parties.

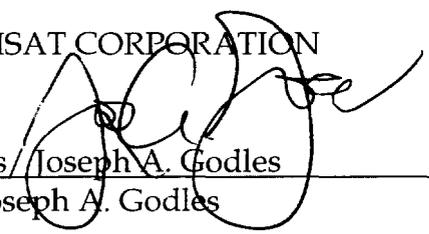
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<sup>1</sup> Comsat Comments at 4.

Finally, in the event some form of the proposed rule change is adopted, PanAmSat agrees with Comsat's observation that "the EIRP allowed to be transmitted toward the geostationary arc should be reduced" in proportion to any reduction in the channelization bandwidth used by FS systems.<sup>2</sup> Effective band sharing by terrestrial and satellite-based systems depends upon such common-sense limitations.

Respectfully submitted,

PANAMSAT CORPORATION

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April 24, 2000

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<sup>2</sup> Id. at 3.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Reply Comments of PanAmSat Corporation was sent by first-class mail, postage prepaid, this 24th day of April, 2000, to each of the following:

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