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May 4, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND DELIVERY

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

Re: Notice of Ex Parte Presentation:
IB Docket No. 98-172, RM-9005, RM-9118

Dear Ms. Salas:

Pursuant to Section 1.1206(b) of the Commission's rules, Hughes Network Systems ("Hughes") hereby submits this notice of an ex parte presentation. On May 4, 2000, Joslyn Read of Hughes and the undersigned briefly met with Adam Krinsky of Commissioner Tristani's office to discuss the enclosed document that was provided to Mr. Krinsky. An original and one copy are enclosed.

Respectfully submitted,

John P. Janka

cc: Adam Krinsky

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List ABCDE

HNS Spaceway Proposal for Blanket Licensing in Shared 18 GHz Band

Background:

GSO FSS Ka band satellite systems will use two pairs of frequency bands for their terminals:

- (i) 29.5-30.0 GHz uplink and 19.7-20.2 GHz downlink; and
- (ii) 28.35-28.6/29.25-29.5 GHz uplink and 18.3-18.8 GHz downlink.

In the first pair, the 29.5-30.0 GHz/19.7-20.2 GHz band is not shared terrestrially, and is suitable for the types of VSAT blanket licensing used at Ku band today.

In the second pair, the 28.35-28.6/29.25-29.5 GHz uplink band is not shared terrestrially, and is also suitable for the type of VSAT blanket licensing used at Ku band today. The part of the 18.3-18.8 GHz band that may be shared terrestrially is suitable for a frequency registration process, such as the one used today for C band receive only terminals, or C band VSATs. This voluntary registration provides protection from harmful interference caused by other co-primary users of the band.

The GSO FSS industry group has reached consensus and made recommendations to the Commission on the relevant parameters to avoid adjacent satellite interference caused by blanket licensed terminals.

Any Ka band earth station licensing approach should draw from applicable elements of the Ku and C band rules that apply to broadly-deployed small terminals in those bands.

Proposed Earth Station Licensing Approach in Shared 18 GHz Downlink Band:

1. Satellite service provider files blanket license application that covers the parameters for large numbers of technically-identical, small terminals located throughout the US. This application covers all relevant operational issues. As uplink band is not shared, there is no threat of interference into terrestrial users. This blanket license approach is generally consistent with that used for Ku band VSATs.
2. Customer buys satellite terminal from a vendor outlet (mass market) to whom satellite service provider has given distribution rights.
3. Vendor provides order to a professional installation company
4. Installation company reviews database of licensed PCO links:
 - a. If a PCO link exists that the satellite service company believes would cause unacceptable interference to a Ka-band satellite terminal, terminal will not be used at that location.
 - b. If no unacceptable interference is anticipated (by nearby PCO links), installation company installs terminal at consumer premises.

- c. Operation of terminal is covered by the terms of the satellite service provider's blanket license
 - d. If desired, installation company may register the terminal with the FCC or other appropriate frequency coordinator for terrestrial interference protection in the shared portions of the 18 GHz band. "Coordination" is not required because the terminal does not transmit in a shared band. Registration in the 18 GHz downlink band should remain optional, as it is today for C band receive-only terminals.
 - e. Reduced application fees are appropriate for the "routine" registration of individual terminals, as with blanket licensed small C band terminals (e.g., allow 1000 terminals to be registered in a batch for \$295).
5. PCO company wishing to install a new link would search the same frequency use database and would work around the protection zones for registered satellite terminals. PCO company is not required to protect non-registered satellite terminals in the shared 18 GHz band.