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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 10, 2000

Via Hand Delivery

Magalie Roman Salas, Secretary
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445 12th St., S.W., Room TW-B204
Washington, D.C. 20554

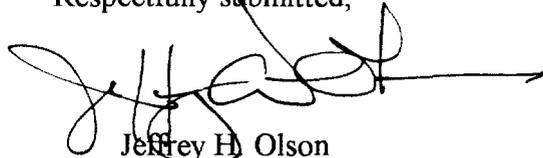
Re: Ex Parte File Nos. ET Docket No. 98-206,
48-SAT-P/LA-97, 89-SAT-AMEND-97,
130-SAT-AMEND-98

Dear Ms. Salas:

On October 10, Mark MacGann, Vice President of SkyBridge L.P., and the undersigned met in person with Commissioner Furchtgott-Roth and Bryan Tramont, Legal Advisor to Commissioner Furchtgott-Roth, for the purpose of discussing issues relating to the above-referenced matters. During the meeting, the attached material was discussed.

If there are any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Jeffrey H. Olson
Attorney for SkyBridge L.P.

Enclosure

cc: Commissioner Harold Furchtgott-Roth
Bryan Tramont, Esq.

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NGSO FSS Ku-BAND LICENSING

- As Commission recognized in its first Section 706 Report, satellite systems -- and particularly LEO systems -- hold the greatest potential for bridging the digital divide, as they are the only systems capable of providing fully interactive, high-speed broadband services to all parts of the country, with the same costs for both rural and urban areas.
- The Report and Order in ET Docket 98-206 will establish allocation and service rules for Ku-band NGSO FSS systems, including the SkyBridge LEO system, which is specifically designed to provide the critical services identified by Congress and the Commission. These systems are now ready to be licensed.
- The FCC's traditional approach to satellite licensing -- encouraging the various applicants to reach a compromise -- will not work in the instant case. Many of the applicants have every incentive to delay the development of these Ku-band systems, because they are committed to the development of competitive satellite systems designed to operate in other frequency bands. A licensing compromise cannot be achieved unless all parties view compromise as being in their best interest.
- The only rational solution is to license all systems now, at the full bandwidth sought by each applicant, consistent with the allocation and service rules adopted in the Report and Order, with strict milestones established for construction, launch and operation.
- Each licensee should be authorized to use the full bandwidth requested in its application, subject to the obligation to coordinate with other licensees as new systems prepare to enter service.
- This is similar in approach to the recent 2 GHz Report and Order, but takes into account both the larger spectrum needs of broadband systems (as compared with the MSS systems at issue in the 2 GHz proceeding), as well as the increased interference avoidance capability afforded by most NGSO system designs (as compared with GSO satellites). Rather than assigning a narrow "home" band for each system, as was done in the 2 GHz proceeding, each Ku-band NGSO FSS licensee should be licensed for the full bandwidth requested in its application, which will facilitate coordination through satellite diversity solutions, in addition to the more traditional frequency diversity approach.
- An expedited, flexible licensing process of the sort described above will accelerate the deployment of affordable, high-speed interactive broadband services to every corner of the U.S.