

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

In the Matter of)	
)	
Amendment of the Commission's Rules)	ET Docket No. 98-237
With Regard to the 3650-3700 MHz)	
Government Transfer Band)	

REPLY COMMENTS OF GE AMERICAN COMMUNICATIONS, INC.

GE American Communications, Inc. ("GE Americom"), by its attorneys, hereby submits its reply to the comments of other parties relating to the *First Report and Order and Second Notice of Proposed Rulemaking* in the above-captioned proceeding.¹

In its Comments, GE Americom addressed three issues relating to continued use of the 3650-3700 MHz band for satellite services. We supported removal of footnote US 245; we urged the Commission to permit use of the band for TT&C for Ka-band systems and above; and we endorsed the Commission's proposals regarding protection of grandfathered earth stations from interference resulting from fixed service operations. *See* GE Americom Comments at 5-7. As discussed below, other commenters agree, and the record here supports Commission action to facilitate and protect continued satellite operations in the 3650-3700 MHz band.

¹ *See Amendment of the Commission's Rules With Regard to the 3650-3700 MHz Government Transfer Band, First Report and Order and Second Notice of Proposed Rulemaking*, FCC 00-363 (rel. Oct. 24, 2000) ("Order").

Deletion of Footnote US 245: Several parties submitted comments in favor of removing footnote US 245, which currently restricts operations in the 3650-3700 MHz bands to international intercontinental systems subject to case-by-case electromagnetic compatibility analysis.² For example, Inmarsat noted that more flexible access to the band could help ameliorate spectrum congestion in the C-band. Inmarsat Ltd. Comments at 3. Astrolink agreed that deletion of the footnote would promote efficient satellite use of the band and noted that case-by-case compatibility analysis to protect government radiolocation operations was no longer needed in light of the reallocation of the band from government to commercial use. ASTROLINK International LLC Comments at 9-10.

No party opposed removal of the footnote. Accordingly, GE Americom requests that the Commission adopt its proposal to delete footnote US 245 from the table of allocations.

TT&C Operations in 3650-3700 MHz Band: There was similarly broad support for the Commission's proposal to permit TT&C operations in the 3650-3700 MHz band for satellite systems with communications in the Ka-band and above.³ A number of satellite system operators noted that the extended C-band offers more favorable signal propagation characteristics and therefore higher

² See, e.g., EchoStar Comments at 6 n.14; Inmarsat Ltd. Comments at 3-4; Extended C-Band Ad Hoc Coalition Comments at 18-19; ASTROLINK International LLC Comments at 9-10; Lockheed Martin Corporation Comments at 5-6.

³ See, e.g., EchoStar Comments at 5-6; Extended C-Band Ad Hoc Coalition Comments at 20-23; ASTROLINK International LLC Comments at 6-9; Lockheed Martin Corporation Comments at 2-3.

reliability than in-band TT&C for systems at Ka-band and above.⁴ Furthermore, there was agreement that using earth station diversity would not solve the problem of ensuring reliability for mission-critical TT&C transmissions. For example, Lockheed Martin noted that earth station site diversity would not guarantee reliability and would be economically inefficient given the extremely high costs of TT&C earth stations. Lockheed Martin Corporation Comments at 2-3.

Like GE Americom, several other parties urged the Commission to permit TT&C operations in the extended C-band for Ka-band and V-band systems without requiring a showing of particularized need.⁵ Instead, extended C-band spectrum should be available for this purpose upon request given the need for reliability of TT&C and the recognized issues relating to propagation characteristics of operations at Ka-band and above.

GE Americom also agrees with Astrolink that the Commission should delete the phrase “on a secondary basis” from the language of proposed Section 25.202(g)(1). ASTROLINK International LLC Comments at 7-8. Astrolink points out that the phrase is potentially misleading and unnecessary. Not all TT&C operations in the extended C-band will be secondary to fixed services under the policies the Commission has adopted. The licensing status of TT&C operations will

⁴ See, e.g., Extended C-Band Ad Hoc Coalition Comments at 21; Lockheed Martin Corporation Comments at 2.

⁵ See, e.g., Extended C-Band Ad Hoc Coalition Comments at 22; Lockheed Martin Corporation Comments at 3. See also ASTROLINK International LLC Comments at 8-9 (TT&C operations should be allowed provided proposal is consistent with spectrum efficiency and is properly coordinated).

be determined pursuant to footnote NG 169, which incorporates the grandfathering policies set forth in the *Order*. As a result, deletion of the phrase relating to secondary status for TT&C operations will not alter the status of earth stations not eligible for grandfathering. Instead, it will simply ensure there is no misunderstanding regarding the primary status of grandfathered TT&C earth stations.

FSS-FS Coordination and Interference Control: Finally, the record supports the Commission's proposals regarding coordination between fixed service operations and FSS earth stations. A number of commenters endorse the Commission's plan to employ Part 25 coordination procedures based on Appendix S7 of the ITU Radio Regulations.⁶ There is also agreement that the procedures should accommodate future changes in polarization and orientation of grandfathered earth stations.⁷ In addition, commenting parties concur with the Commission's view that there is no need for earth station antenna size limits in spectrum adjacent to the 3650-3700 MHz band.⁸

GE Americom accordingly urges the Commission to adopt its proposals regarding FSS/FS coordination and protection of FSS earth station operations from interference.

⁶ See, e.g., Lockheed Martin Corporation Comments at 3; Comsearch Comments at 4.

⁷ See, e.g., EchoStar Comments at 4-5; ASTROLINK International LLC Comments at 3, 5; Lockheed Martin Corporation Comments at 4; Extended C-Band Ad Hoc Coalition Comments at 19-20.

⁸ See, e.g., Lockheed Martin Corporation Comments at 5.

CONCLUSION

For the foregoing reasons, GE Americom respectfully requests that the Commission delete footnote US 245, permit TT&C operations in the 3650-3700 MHz band for systems operating at Ka-band and above, and adopt the proposals discussed above for protection of FSS earth stations from harmful interference.

Respectfully submitted,

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January 16, 2001