

Magalie R. Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: IB Docket No. 00-203; RM-9649

Dear Ms. Salas:

On October 24, 2000, the Commission released a Notice of Proposed Rulemaking in the above-referenced proceeding in which it asked for comment on a proposal to add a “demonstrated use” requirement for Fixed-Satellite Service earth stations licensed to use C-band or Ku-band frequencies that are shared with terrestrial services. Under the proposal, an earth station operator would lose its priority to use frequencies requested by a terrestrial operator if it could not demonstrate that it is using, has recently used, or has imminent plans to use, the frequencies requested. Radio Netherlands / BVN-TV opposes that proposal.

Radio Netherlands is the original and only Dutch International Public Broadcaster and was established just after World War II. Nowadays, being an up-to-date Multi-media Broadcaster, it serves a huge audience worldwide with Radio, TV and Written information through Internet, Satellite and Short wave, in seven languages. Amongst our worldwide partners is CNN. For more information please visit: www.rnw.nl/corporate/

Radio Netherlands requires and demands reliable and effective satellite service in order to meet its business needs. We recognize that in order to provide service at the level that we demand, satellite service providers must have significant flexibility to manage their fleets efficiently and, when necessary, to shift services from transponder to transponder, or from satellite to satellite. The need for flexibility is particularly acute in times of emergency or when there has been an equipment failure, but can arise at any time.

Radio Netherlands is concerned that the proposed “demonstrated use” requirement would unreasonably constrain satellite service providers and thereby impair their ability to meet our business needs. Radio Netherlands therefore, requests that the Commission abandon its proposal to add a “demonstrated use” requirement to its earth station rules.

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Sincerely,

/s/ Leo Kool

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/s/ John Groenestijn

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February 9, 2001