

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. A.G. Edwards & Sons, Inc. opposes that proposal.

A.G. Edwards & Sons, Inc. is a national investment firm with the industry's fourth-largest retail distribution network, encompassing more than 6,900 financial consultants in 690 offices throughout 49 states, the District of Columbia and London, England. A.G. Edwards is a member of all major stock and commodities exchanges, including the New York Stock Exchange. A. G. Edwards relies on satellite communication to provide network connectivity for all offices in the Continental United States.

A.G. Edwards & Sons, Inc. 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.

A.G. Edwards & Sons, Inc. is concerned that the proposed "demonstrated use" requirement would unreasonably constrain satellite service providers and thereby impair their ability to meet our business needs. A.G. Edwards & Sons, Inc. therefore, requests that the Commission abandon its proposal to add a "demonstrated use" requirement to its earth station rules.

Sincerely,

/s/ Glenn Canales
Glenn Canales
Supervisor, Network Engineering
A.G. Edwards & Sons, Inc.

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November 13, 2000
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