Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
2002 Biennial Review of	)	IB Docket No. 02-309
Telecommunications Regulations	)	
	)	

REPLY COMMENTS OF PANAMSAT CORPORATION

PanAmSat Corporation ("PanAmSat"), by its attorneys, hereby replies to the comments of Intelsat LLC ("Intelsat") in the International Bureau's above-captioned 2002 Biennial Review of Telecommunications Regulations ("2002 IB Biennial Review") proceeding.[1]

Discussion

In its comments, Intelsat calls for eliminating what it calls "unnecessary technical information" requirements.[2] PanAmSat's reply comments are limited to one of the items that Intelsat wants the Commission to dispense with: the requirement, embodied in Section 25.210(a) of the Commission's rules, that C-band satellites employ orthogonal linear and switchable polarization.[3]

Intelsat acknowledges that the Commission adopted this rule to facilitate two degree spacing between satellites offering analog television.[4] It contends, however, that the rule has outlived its usefulness, maintaining that today most television transmissions have been upgraded to digital technology, which is more easily coordinated.

---

[1] *See Commission Seeks Public Comment in 2002 Biennial Review of the Telecommunications Regulations within the Purview of the International Bureau,* IB Docket No. 02-309, Pubic Notice, FCC 02-263 (*rel.* Sept. 26, 2002). ("Biennial Review PN")
[2] Intelsat Comments at 23

Like Intelsat, PanAmSat supports the elimination of unnecessary technical information requirements. Intelsat is incorrect, however, in assuming that most television transmissions today are digital transmissions. To the contrary, many satellite customers continue to make use of analog TV/FM carriers. In fact, on some PanAmSat satellites, over half of the transponders are dedicated to analog video traffic. It is essential that these customers continue to be protected from interference.

The C-band linear polarization requirement of Section 25.210(a) complements the uniform C-band frequency plan set forth in Section 25.211(a) of the rules.[5] These rules continue to serve the purposes for which they were adopted by facilitating frequency sharing of analog TV/FM signals without coordination in the C-band. Together, they ensure that C-band transponders operating on the same frequencies on adjacent satellites are cross-polarized,[6] and that C-band transponders on adjacent satellites that are co-polarized are offset in frequency from one another. Without these requirements, TV/FM carriers would have to be coordinated case by case, a nearly impossible task at two degrees absent concessions that change the nature of the service that can be provided.

Linear polarization and the mandatory frequency plan for C-band are both indispensable to distribution of analog TV/FM signals. If some orbital locations had linear polarization and others had circular polarization, satellite operators could not count on taking advantage of a guard band at all locations. The mandatory frequency plan maximizes the utility of the guard band, ensuring that the center frequency of one transponder falls in the guard band of the co-polarized transponder on the adjacent satellite.

---

[3] *See id* at 24-25.
[4] *Id.*
[5] Intelsat has not explicitly requested elimination of the uniform frequency plan.
[6] For example, if the polarization on a transponder at 133° W.L. were horizontal, then the polarization on the co-channel transponder at 131° W.L. would be vertical; 129° W.L. would be horizontal, 127° W.L. would be vertical again, and so on. See 47 C.F.R. § 25.210(a)(3).

The switchable polarization requirement also is essential to implementing two-degree spacing on C-band frequencies. The requirement facilitates band sharing, and reduces the likelihood of unacceptable interference, by ensuring that no matter where within the U.S. domestic arc a satellite is located or relocated, it can be configured to conform to the Commission's C-band plan.

CONCLUSION

In view of the foregoing, the Commission should retain the requirement that C-band satellites employ orthogonal linear and switchable polarization. Use of analog TV/FM carriers on C-band frequencies remains extensive, and the current rules make it possible for satellites operating such carriers to be spaced two degrees apart. Intelsat's proposed changes, if implemented, would cause this system to collapse.

Respectfully submitted,

PANAMSAT CORPORATION

Michael A. McCoin

Joseph A. Godles
Michael A. McCoin

GOLDBERG, GODLES, WIENER & WRIGHT
1229 Nineteenth Street, N.W.
Washington, DC 20036
(202) 429-4900
Its Attorneys

November 4, 2002

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by first-class mail, postage prepaid, this 4th day of November, 2002, to the following:

Wiley Rein & Fielding LLP
Attention: Bert W. Rein
Carl R. Frank
Jennifer D. Hindin
Chin Kyung Yoo
1776 K Street, N.W.
Washington, D.C. 20006-2304

Intelsat Global Service Corporation.
Attention: David B. Meltzer
Susan H. Crandall
3400 International Drive, N.W.
Washington, D.C. 20008

/s/ Ryan N. Terry
Ryan N. Terry