

# COALITION OF C-BAND CONSTITUENTS

September 15, 2003

## By Electronic Filing

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: In the Matter of the Commission's Rules Regarding Ultra-Wideband  
Transmission Systems (ET Docket No. 98-153)

Dear Ms. Dortch:

This letter is submitted on behalf of the Coalition of C-Band Constituents ("Coalition") in response to the Petitions for Reconsideration and related pleadings submitted in the above-referenced proceeding. The Coalition is made up of program networks and distributors, broadcast networks, satellite operators and others that use C-band frequencies for numerous satellite services, and in particular, the distribution of television program networks.<sup>1/</sup>

The Coalition supports the Petition for Reconsideration submitted by the Satellite Industry Association ("SIA") in this proceeding. SIA submits that the Commission's rules for ultra-wideband ("UWB") devices should be revised because, based on certain aspects of the Commission's technical analysis and its assumptions, there is a serious potential that UWB devices will cause harmful interference to fixed satellite service systems operating in the 4 GHz downlink bands.

As the Coalition advised the Commission in a June 30, 2003 meeting with certain Commission staff, the Coalition believes further research is necessary to understand the effects of new ultra-wideband devices operating on an unlicensed basis on the frequencies used for the reception of C-band satellite services,

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<sup>1/</sup> Members of the Coalition are: A&E Television Networks, CBS, C-SPAN, Discovery, E!, Fox Network, Fox Cable, HBO, iNDemand, Lifetime, Loral Skynet, MTV, PanAmSat, Scripps Networks, SES Americom, Showtime, Starz!, USA and Warner Bros.

especially video distribution services of almost all major broadcast and cable program networks. The Coalition is funding independent research to analyze how UWB and other unlicensed devices may co-exist with C-Band users with minimal risk of disruptive interference. The independent research, which is well underway, will model, simulate, quantify and demonstrate the “real world” effect of UWB and lower adjacent band unlicensed devices on C-Band reception.

The SIA Petition for Reconsideration raises many of the issues that the Coalition’s funded research is addressing including the peak EIRP levels versus average EIRP density levels and other sharing parameters. Accordingly, the Coalition submits that the Commission should await the results of the independent research and consider such results in the deliberations on the pending Petitions for Reconsideration.

Respectfully submitted,

/s/

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Ms. Marlene H. Dortch  
September 15, 2003  
Page 3

cc via email:

Chairman Michael Powell  
Commissioner Kathleen Abernathy  
Commissioner Michael Copps  
Commissioner Kevin Martin  
Commissioner Jonathan Adelstein

Qualex International

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