

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of: )  
 )  
 ) RM No. 10800  
Amendment of Part 25 of the Commission's )  
Rules To Adopt Licensing and Service Rules )  
for Aeronautical Mobile-Satellite Service )  
("AMSS") Operations in the Ku-Band )

To: The Commission

**REPLY COMMENTS OF INTELSAT LLC**

Intelsat LLC ("Intelsat") submits these brief reply comments in this proceeding, which seeks the initiation of a rulemaking to adopt rules governing Aeronautical Mobile-Satellite Service ("AMSS") operations in the Ku-band.<sup>1</sup> As a U.S.-licensed satellite operator, and as a provider of satellite capacity to The Boeing Company ("Boeing") for the Connexion by Boeing<sup>SM</sup> system, Intelsat has an interest in the outcome of this proceeding.

Intelsat notes that all parties that commented on Boeing's petition for rulemaking support the commencement of a rulemaking proceeding to adopt licensing and service rules for AMSS operations in the Ku-band.<sup>2</sup> Intelsat also notes the Commission's recent allocation of the 14.0-

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<sup>1</sup> See *Petition for Rulemaking*, Amendment of Parts 2 and 25 of the Commission's Rules to Allocate Spectrum in the 14-14.5 GHz Band to the Aeronautical Mobile-Satellite Service ("AMSS") and to Adopt Licensing Rules for AMSS Operations in the Ku-Band, filed by The Boeing Company (July 21, 2003); see also *Public Notice*, Consumer & Governmental Affairs Bureau, Reference Information Center, Petition for Rulemaking Filed, Report No. 2632 (Oct. 2, 2003).

<sup>2</sup> See Comments of Aeronautical Radio, Inc., RM-10800 (filed Nov. 3, 2003); Comments of The Boeing Company, RM-10800 (filed Nov. 3, 2003); Comments of PanAmSat Corp., RM-10800 (filed Nov. 3, 2003); Comments of Rockwell Collins Corp., RM-10800 (posted to FCC ECFS on Nov. 14, 2003).

14.5 GHz band to the Mobile-Satellite Service (“MSS”), including AMSS, on a secondary basis,<sup>3</sup> and the recent application of Aeronautical Radio, Inc. (“ARINC”) to implement the SKYLink AMSS system.<sup>4</sup> These developments confirm the need to develop AMSS licensing and service rules to ensure that these innovative new services can be provided to U.S. consumers in a manner that fully protects the operations of other authorized users of the Ku-band.

In view of these developments, Intelsat supports Boeing’s petition for rulemaking to adopt licensing and service rules for AMSS operations in the Ku-band.

Respectfully submitted,

INTELSAT LLC

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<sup>3</sup> See *Amendment of Parts 2, 25, and 87 of the Commission's Rules to Implement Decisions from World Radiocommunication Conferences Concerning Frequency Bands Between 28 MHz and 36 GHz and to Otherwise Update the Rules in this Frequency Range*, ET Docket No. 02-305, FCC 03-269, ¶¶ 72-78 and App. B (rel. Nov. 4, 2003).

<sup>4</sup> See *Aeronautical Radio Inc., Application for Blanket Authority to Operate Aboard Aircraft up to 1000 Technically-Identical Transmit and Receive Mobile Earth Stations in the 11.7-12.2 and 14.0-14.5 GHz Frequency Bands*, File No. SES-LIC-20030910-01261, Call Sign E030205 (filed Sept. 2, 2003).

**CERTIFICATE OF SERVICE**

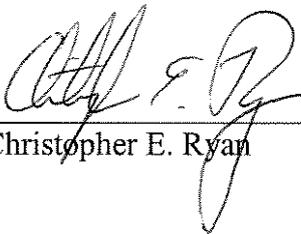
I, Christopher E. Ryan, hereby certify that on Tuesday November 18, 2003, I served the foregoing **Reply Comments of Intelsat LLC**, by first-class mail, postage prepaid, on the following parties:

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