

**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 SES AMERICOM, INC.

SES Americom, Inc. ("SES Americom"), by its attorneys, files these reply comments in the above-captioned proceeding, in which The Boeing Company ("Boeing") has proposed that the Commission adopt licensing and service rules for Aeronautical Mobile-Satellite Service ("AMSS") operations in the Ku-band.¹ SES Americom provides Ku-band satellite capacity to Boeing for its authorized AMSS system -- the Connexion by BoeingSM system -- on the AMC-4 satellite.

All commenters in this proceeding support the initiation of a rulemaking proceeding to develop licensing and service rules for operations in the Ku-band.² In addition, the Commission recently allocated the 14.0-14.5 GHz band to the Mobile-Satellite Service ("MSS"), including

¹ 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, Report No. 2632 (Oct. 2, 2003).

² 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 Corporation, RM-10800 (filed Nov. 3, 2003).

AMSS, on a secondary basis, a decision which implements domestically the international AMSS allocation adopted at WRC-03.³ Moreover, Aeronautical Radio, Inc. (“ARINC”) recently filed an application to provide AMSS services using its proposed SKYLink system.⁴ These developments confirm the pressing need to develop comprehensive AMSS licensing and service rules to ensure that innovative AMSS services can be offer in the United States in a manner that fully protects the operations of other authorized users of the Ku-band.

In view of these recent development and unanimity in support of the proposed rulemaking, SES Americom urges the Commission to promptly initiate a rulemaking proceeding to adopt licensing and service rules for AMSS operations in the Ku-band.

Respectfully submitted,

SES AMERICOM, INC.

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³ 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 (rel. Nov. 4, 2003) at ¶¶ 72-78 and App. B.

⁴ 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 (Sept. 2, 2003).

CERTIFICATE OF SERVICE

I, Christine Reilly, hereby certify that on this 18th day of November, 2003, I caused to be served the foregoing Reply Comments in RM No. 10800 to the following by U.S. Mail, first class, postage prepaid.


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