

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
The FCC's Advisory Committee)	IB Docket No. 04-286
Recommendations for the)	DA 06-960
2007 World Radiocommunication Conference)	

**PanAmSat Comments on Recommendations Approved by the
Advisory Committee for the 2007 World Radiocommunication Conference in
DA 06-960 (IB Docket No. 04-286)**

PanAmSat Corporation ("PanAmSat") presents here comments on the recommendations approved by the World Radiocommunication Conference Advisory Committee (WRC-07 Advisory Committee) on April 27, 2006. These recommendations appear in the Public Notice issued by the Commission on May 1st, 2006, DA 06-960 ("Public Notice").

PanAmSat's comments are limited to the draft US proposal contained in Document WAC 106(27.04.06)¹ that addresses WRC-07 agenda item 1.10². Most of these comments are clarifications and/or complements to the text of the draft proposal and, in no way, represent a departure from the basic objectives of the current text.

The changes to the draft proposal are detailed below. Added text is in bold italic and underlined while deleted text is identified by a double strikethrough.

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Processing of Submissions

One of the great concerns expressed by administrations is the lengthy process involved in the conversion of allotments into assignments. While the current *sequential* processing of submissions does allow for an accurate consideration of the effect of each submission, the time taken for this process is prohibitively long. It has been estimated that under the current sequential approach the BR is able to process **annually**

¹ See pages 85-106 of the Public Notice.

² Agenda Item 1.10: to review the regulatory procedures and associated technical criteria of Appendix 30B without any action on the allotments, the existing systems or the assignments in the List of Appendix 30B.

about 8 Appendix 30B submissions (with the possibility of simultaneous submissions from the same administration this number can be slightly increased).

Reason: to clarify that 8 submissions are expected to be processed in one year.

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6.24. After a notice is published under § 6.21, should the notifying administration resubmit the notice and insist upon its reconsideration, the Bureau shall enter the assignments provisionally in the List with an indication of those administrations whose allotments or assignments were the basis of the unfavourable finding¹¹. The entry shall be changed from provisional to definitive recording in the List only if the Bureau is informed by the administration that submitted the assignment that the new assignment has been in use, together with the assignments which were the basis for the unfavourable finding, for at least four months without any complaint of harmful interference being made or if the assignments which were the basis for the unfavourable finding are cancelled.

Reason: to clarify: (i) that the unfavorable finding referred to in this provision can also result from an allotment being affected; (ii) which administration submits the information described in this provision.

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§ 6.24 through § 6.26 open the possibility of provisional entry in the List. It is important that this flexibility be introduced to prevent that assignments that may never be brought into use unduly block the implementation of assignments that would otherwise be implemented. ~~In § 6.24 through § 6.26, provisional entry in the list has been limited to the cases in which the assignments that were the basis for the unfavourable finding be additional uses in the list or submitted notices for additional uses. By doing this, it is ensured that provisional entries in the list may be incompatible with allotments or assignments resulting from the conversion of allotments. This approach provides a reasonable balance between the interests of ITU member states that want to implement their allotments and those of administrations that want to use capacity (orbit/spectrum resources) beyond that in the plan.~~

Reason: the latter part of the justification for the proposed § 6.24 through § 6.26 refers to a previous version of the US draft proposal. This text is not consistent with the proposals for § 6.24 through § 6.26 contained in the document and should therefore be deleted.

CONCLUSION

For the reasons set forth above and in the above-captioned Public Notice, the Commission should incorporate these changes to the proposed recommendations.

Respectfully submitted,
PANAMSAT CORPORATION

By: /s/ Joseph A. Godles
Joseph A. Godles

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

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