

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)
)
Amendment of Parts 2 and 25 of)
the Commission's Rules to Allocate)
Spectrum in the Ku- and Extended)
Ku-Bands to the Vehicle Mounted Earth) RM No. 11336
Station Satellite Service ("VMES") on a)
Shared Primary Basis and to Adopt)
Licensing and Service Rules for VMES)
Operations in the Ku- and Extended)
Ku-Bands)

To: The Commission

COMMENTS OF MARITIME TELECOMMUNICATIONS NETWORK, INC.

Maritime Telecommunications Network, Inc. ("MTN"), through counsel, and pursuant to Section 1.405(a) of the Commission's Rules, 47 C.F.R. § 1.405(a), hereby submits these Comments in support of the above-captioned petition for rule making ("Petition") that was filed by General Dynamics SATCOM Technologies, Inc. ("General Dynamics") on May 24, 2006. General Dynamics has petitioned the Commission to amend Parts 2 and 25 of the Commission's Rules to allocate spectrum in the Ku-band and the extended Ku-band fixed-satellite service ("FSS") frequencies for use by what General Dynamics calls Vehicle Mounted Earth Stations ("VMESs"), and to adopt service rules for these operations. General Dynamics proposes that the Commission authorize the use of VMESs in exactly the "same approach" as Earth Stations on Vessels ("ESVs").

BACKGROUND

MTN is the nation's leader in maritime communications. MTN provides broadband solutions for voice, data, Internet and compressed video services to the mobile maritime industry

using state-of-the-art ESV technology. With its decades of experience operating earth stations in motion with existing FSS satellite systems, MTN looks forward to exploring the issues raised by General Dynamics, as well as those of other parties with a view towards encouraging new compatible uses of FSS spectrum, and to sharing its knowledge of the use of conventional FSS spectrum in applications in motion. MTN thus endorses General Dynamic's efforts to initiate a rulemaking proceeding to explore appropriate service rules and frequency allocations for VMESs.

DISCUSSION

MTN's experience shows that Ku-band and extended Ku-band FSS spectrum can be used by earth stations on moving vehicles and other land-based platforms on the same general terms and conditions that now apply to ESV use of the same bands. If properly implemented, MTN agrees with General Dynamics that such expanded use of the FSS will promote efficient use of the spectrum, improve access to spectrum by new services with mutually compatible technical characteristics, and contribute to the deployment of broadband technologies.

Starting from an initial proposition that VMESs will access FSS satellites on the technical conditions that apply in today's two-degree spacing environment, and that any potential mispointing of antennas would be immediately and automatically terminated, MTN can envision that VMESs can be operated compatibly with existing Ku-band satellite networks. Section 25.222 and the other Commission rules that govern the operation of ESVs in the same Ku-band and extended Ku-band frequencies provide an excellent starting point for the regulatory consideration of VMESs. These rules specify off-axis EIRP spectral density and antenna pointing accuracy requirements designed to protect FSS Ku-band operators. MTN encourages the Commission to adopt a notice of proposed rule making for Ku-band/extended Ku-band VMESs patterned on the relevant ESV rules.

MTN believes that VMESs, operated as part of Ku-band/extended Ku-band FSS networks in a manner technically indistinguishable from fixed FSS terminals or even ESVs, would advance the public interest, convenience, and necessity. As General Dynamics asserts, VMESs offer a wide range of potential commercial uses including homeland defense, disaster recovery to supplement or replace disabled terrestrial communications systems, satellite newsgathering, weather services in remote areas, mineral/fossil fuel exploration and extraction, and large-scale construction projects.

Accordingly, MTN supports the proposal to establish a rulemaking proceeding to address VMESs' use of Ku-band/extended Ku-band FSS spectrum, and looks forward to providing comments, consistent with its experience in operating ESV networks.

CONCLUSION

The Commission should grant General Dynamics' Petition and initiate a rulemaking proceeding to address the implementation and use of earth stations on moving vehicles and land-based platforms.

Respectfully submitted,

MARITIME TELECOMMUNICATIONS NETWORK, INC.

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August 21, 2006

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CERTIFICATE OF SERVICE

I, Rebecca J. Cunningham, hereby certify that a true and correct copy of the foregoing Comments of Maritime Telecommunications Network, Inc. was sent by first-class, postage prepaid mail, this 21st day of August, 2006, to the following:

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