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UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

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AUG 17 2006

Federal Communications Commission
Office of the Secretary

Mr. Donald Abelson
Chief of the International Bureau
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Dear Mr. Abelson:

On June 22, 2000, the FCC released a Report and Order titled *Redesignation of the 17.7-19.7 GHz Frequency Band, Blanket Licensing of Satellite Earth Stations in the 17.7-20.2 GHz and 27.5-30.0 GHz Frequency Bands, and the Allocation of Additional Spectrum in the 17.3-17.8 GHz and 24.75-25.25 GHz Frequency Bands for Broadcast Satellite-Service Use ('Order')* (FCC 00-212; IRAC Doc. 31359/2). One result of this Order is that the broadcasting-satellite service ("BSS") has been allocated on a primary basis in the band 17.3-17.7 GHz and footnote NG163 states, "The allocation to the broadcasting-satellite service in the band 17.3-17.7 GHz shall come into effect on 1 April 2007".

The adjacent band below 17.3 GHz is allocated on a primary basis to the Federal Government for radiolocation. I am concerned that adjacent band interference may occur from radiolocation stations operating below 17.3 GHz, especially from aeronautical stations, to the BSS receiving earth stations in the band 17.3-17.8 GHz. Because of the high power of the radars, interference may occur even though the radiolocation systems meet current regulations with respect to unwanted emissions.

Considering the long lead development and life cycle of radiolocation and BSS systems, it would appear to be prudent for the radiolocation and the BSS communities to begin discussions to ensure adjacent band compatibility. These discussions should include the possibility of mitigation techniques in both the radiolocation transmitters and the BSS receivers. I recently sent a letter to DoD expressing my concerns about this potential for adjacent band interference and requested that they identify a point-of-contact.

In order to assist in initiating these informal discussions between the radiolocation and BSS communities, I request that the FCC identify a point-of-contact. If you support this direction, I will have Mr. Robert Hinkle (202-482-3212; rhinkle@ntia.doc.gov) set up a meeting between NTIA, the FCC, and DoD to discuss the best way to proceed.

Sincerely,

Karl B. Nebbia
Deputy Associate Administrator
Office of Spectrum Management

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