

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of

**General Dynamics Corporation**

Petition to Amend Parts 2 and 25 of the  
Commission Rules to Allocate Spectrum in the  
Ku and extended Ku-bands for Vehicle  
Mounted Earth Stations ("VMES")

**COMMENTS OF  
AvL TECHNOLOGIES INCORPORATED**

AvL Technologies Incorporated ("AvL"), hereby supports the General Dynamics Corporation ("General Dynamics") petition to amend Parts 2 and 25 of the Commission's Rules for Vehicle Mounted Earth Stations (VMES) operating in the Ku-band for both Federal and non-Federal applications.

AvL has commented many times on matters (00-248) before the FCC encouraging the FCC to allow and embrace the use of current technologies to advance and increase the use of geo-stationary satellite communications. Antenna pointing technologies have advanced beyond that necessary to assure satisfactory performance of parabolic antennas of smaller apertures than currently approved by the FCC for a 2° satellite spacing environment. Both initial pointing of Temporary Fixed Earth Stations and continuous pointing of Vehicle Mounted Earth Stations is well within capabilities of current computer controlled positioning technologies as applied by experienced and technically capable companies.

The request by General Dynamics is to simply apply the rules approved for the Earth Station on Vessels ("ESV") to VMES. This request is logical and technically sound and is in the best interest of satellite communications industry.

AvL respectfully requests that the Commission grant the Petition for Rulemaking as requested by General Dynamics.

Respectfully submitted,



James L. Oliver, President  
AvL Technologies