



May 30, 2008

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2008, MD Docket No. 08-65, RM No. 11312**

In the Matter of Amendment of Parts 1, 21, 73, 74, and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands, WT Docket No. 03-66

Dear Ms. Dortch:

The Satellite Industry Association (SIA)¹ hereby submits this letter and the attached previous filings as comments in response to the Federal Communications Commission (FCC) Notice of Proposed Rulemaking (NPRM) and Order in the above-captioned proceedings adopted May 7, 2008.

The NPRM seeks comment on whether the Commission should retain or revise the methodology for collection of the international bearer circuit regulatory fee, which is currently assessed on a per-circuit basis. NPRM at ¶ 8. SIA has strongly supported reform of this fee. In particular, we have endorsed proposals to replace the per-circuit fee with a flat fee collected from holders of Section 214 authorizations and cable landing

¹ SIA is the unified voice of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business. SIA Executive Members include: Arrowhead Global Solutions Inc.; Artel Inc.; The Boeing Company; DataPath, Inc.; The DIRECTV Group; Hughes Network Systems LLC; ICO Global Communications; Integral Systems, Inc.; Intelsat, Ltd.; Iridium Satellite LLC; Lockheed Martin Corp.; Loral Space & Communications Inc.; Mobile Satellite Ventures LP; Northrop Grumman Corporation; SES Americom, Inc.; and TerreStar Networks Inc. Associate Members include: ATK Inc.; Comtech EF Data Corp.; EchoStar Corporation; EMC Inc.; Eutelsat Inc.; Inmarsat Inc.; Marshall Communications Corp.; New Skies Satellites, Inc.; Spacecom Ltd.; Spacenet Inc.; Stratos Global Corp; SWE-DISH Satellite Systems; Telesat and WildBlue Communications, Inc. Additional information can be found at www.sia.org.

licenses. As we have explained, the current system has fundamental flaws that unfairly burden SIA members who are subject to the bearer circuit fee.

SIA is attaching for inclusion in the record here previous SIA filings that set forth in more detail the justifications for revision of the international bearer circuit fee methodology and the changes that should be implemented. These filings continue to reflect the SIA position on this matter:

Comments of the Satellite Industry Association, In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2006; Petition for Rulemaking of USNL Telecommunications (US) Inc., RM-11312 (filed March 17, 2006).

Comments of the Satellite Industry Association, In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2005, MD Docket No. 05-59 (filed March 8, 2005).

Reply Comments of the Satellite Industry Association, In the Matter of Assessment and Collection of No. 04-73 Regulatory Fees for Fiscal Year 2004, MD Docket No. 04-73 (filed April 30, 2004).

SIA urges the FCC to revise its methodology for collection of the international bearer circuit fee consistent with the SIA recommendations set forth in the above-referenced pleadings.

Sincerely,

Patricia Cooper

Patricia Cooper
President
Satellite Industry Association