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**PACIFIC TELESIS**  
Group-Washington

June 20, 1996

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JUN 20 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Re: *RM-8811, Amendment of Parts 2.106 and 25.202 of the Commission's Rules to Allocate the 37.5-38.6 GHz Band to the Fixed-Satellite Service and to Establish Technical Rules for the 37.5-38.6 GHz Band*

On behalf of Pacific Bell Mobile Services, please find enclosed an original and six copies of its "Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

*Alan Rampurero For G.H.*

Enclosure

Rec'd by [unclear] rec'd  
DATE

*at 5*

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

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In the Matter of

Amendment of Parts 2.106 and 25.202 of the  
Commission's Rules to Allocate the 37.5 - 38.6 GHz  
Band to the Fixed-Satellite Service and to Establish  
Technical Rules for the 37.5 - 38.6 GHz Band

RM No. 8811

**COMMENTS OF PACIFIC BELL MOBILE SERVICES**

Pursuant to the Public Notice, dated May 21, 1996,<sup>1</sup> Pacific Bell Mobile Services comments on the above-captioned Petition for Rulemaking submitted by Motorola Satellite Communications, Inc., ("Motorola"). In its Petition Motorola requests that the Commission allocate the 37.5-38.6 GHz band to the Fixed Satellite Service ("FSS") (space-to-earth) on a co-primary basis and to establish power flux density ("PFD") limits for this service.

Motorola expressed a similar position in the Commission's proceeding, ET Docket No. 95-183, RM-8553, PP Docket No. 93-253, Amendment of the Commission's Rules Regarding the 37.0-38.6 and 38.6 -40.0 GHz Bands and Implementation of Section 309(j) of the Communications Act -- Competitive Bidding, 37.0 - 38.6 GHz and 38.6 - 40.0 GHz.<sup>2</sup> We objected to Motorola's position in that proceeding and we maintain the same objection in this proceeding.<sup>3</sup> The allocation sought by Motorola should not be granted unless it is accompanied by adoption of

<sup>1</sup> Public Notice, Report No. 2132 Petitions for Rulemaking Filed, May 21, 1996.

<sup>2</sup> Comments of Motorola, pp. 2-3, March 4, 1996.

<sup>3</sup> Reply Comments of Pacific Bell Mobile Services, p. 8, April 1, 1996.

terrestrial interference standards as defined in Telecommunications Industry Association Bulletin 10. This will allow co-existence with fixed microwave services and satellite services without undue disruption to the fixed microwave services.

Without adoption of the terrestrial standards, the satellite services would be in a "super" primary status that would effectively limit the use of the spectrum by fixed microwave users. Such a situation would be inherently unfair, particularly since the Commission is considering charging fixed microwave applicants for the use of the spectrum through the auction process.

We respectfully urge the Commission to only approve Motorola's petition, if it also orders adoption of the terrestrial interference standards for the FSS.

Respectfully submitted,

PACIFIC BELL MOBILE SERVICES



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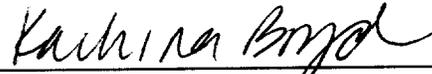
June 20, 1996

**CERTIFICATE OF SERVICE**

I, Kachina Boyd, do hereby certify that a copy of the foregoing COMMENTS OF PACIFIC BELL MOBILE SERVICES was mailed on this 20th day of June 1996, via first class United States mail, postage prepaid to the parties listed below.

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Kachina Boyd