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Federal Communications Commission
Office of Secretary

Before the
Federal Communications Commission
Washington, D.C.

In the Matter of	)	
	)	
Routine Licensing of Large	)	RM-9005
Numbers of Small Antennas	)	
Operating in the Ka-Band	)	

Reply

Lockheed Martin Corporation ("Lockheed Martin"), AT&T Corp. ("AT&T"), Hughes Communications, Inc. ("Hughes"), Loral Space and Communications, Ltd. ("Loral"), and GE American Communications, Inc. ("GE") (hereinafter collectively referred to as the "Petitioners"), pursuant to Section 1.45 (b) of the Rules and Regulations ("Rules") of the Federal Communications Commission ("Commission"), herein reply to the Comments of Teledesic Corporation ("Teledesic"), filed in the above-referenced matter on February18, 1997. Teledesic's Comments were filed in response to the Petitioners' Petition for Rulemaking[1] seeking both the creation of an informal Industry Working Group under the Commission's auspices, and the initiation of a rulemaking proceeding to expedite the routine licensing of large numbers of small antenna earth stations operating in the 28 GHz band in the Geostationary Orbit/Fixed Satellite Service ("GSO/FSS").

[1] See FCC Public Notice, Report No. 2173, dated January 16, 1997 (RM-9005).

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In its Comments, Teledesic supports the Petitioners' requests for blanket licensing in the 19.7-20.2 GHz, 28.35-28.6 GHz and 29.25-30.0 GHz bands (Comments, at pages 1 and 5).[2] Indeed, Teledesic recognizes that a "high density deployment of Fixed Satellite Service earth stations cannot take place unless the Commission eliminates the cost and delay that are associated with the licensing of earth stations" (Comments, at page 2).

In its support of blanket licensing, Teledesic also urges the Commission to consider in any future rulemaking proceeding the blanket licensing procedures for Fixed Satellite Service ("FSS") earth stations operating throughout the 17.7-20.2 GHz and 27.5-30.0 GHz bands. (Comments, at page 1). In support of this request, Teledesic notes that these additional sub-bands should be considered together with those referenced by the Petitioners since (i) they also were "considered by the Commission in its 28 GHz Proceeding;" (ii) Non-Geostationary Orbit/Fixed Satellite Service ("NGSO/FSS") earth stations present the "same policy issues" (i.e., high deployment and direct service) as GSO/FSS earth stations; and (iii) consideration of "inter-service sharing" issues for both the GSO/FSS and the NGSO/FSS already have delayed the introduction of interactive, broadband satellite services (Comments, at pages 2, 3 and 4, respectively).

The Petitioners do not object to the inclusion of the NGSO/FSS downlink sub-band (18.8-19.3 GHz), the NGSO/FSS uplink sub-band (28.6-29.1 GHz), or the GSO/FSS downlink sub-band (17.7-18.8 GHz) in the Petitioners' requested Commission rulemaking. It should be recognized, however, that the downlink sub-bands proposed for

[2] No other comments were filed in response to the Petition. Further, the Petitioners, individually, represent five of the current GSO/FSS applicants for orbital assignments in the portions of the 28 GHz band for which blanket licensing was requested in the Petition.

inclusion by Teledesic (i.e., 17.7-18.8 GHz and 18.8-19.3 GHz) raise different, and potentially more protracted, issues of inter-service sharing (See Petition, at Section IV). Thus, the Petitioners believe it would be most beneficial to address these sub-bands in separate Industry Working Groups to insure that the consideration and resolution of issues surrounding bands which lend themselves most readily to blanket licensing can proceed at the most optimum pace within the rulemaking process. Indeed, Teledesic is quite correct that the consideration of "inter-service ... sharing issues has already delayed the introduction of new services far too long, and the technological headstart once enjoyed by U.S. operators has all but vanished" (Comments, at page 4).

In conclusion, the Petitioners do not oppose the consideration of the additional sub-bands recommended by Teledesic (i.e., 18.8-19.3 GHz, 28.6-29.1 GHz and 17.7-18.8 GHz) in the Petitioners' requested rulemaking for blanket licensing. Accordingly, they request that the Petition be granted, and that separate Industry Working Groups be formed as quickly as possible to address the unique sharing issues of each sub-band in a timely fashion, and that the requested rulemaking proceeding be structured to permit the earliest possible adoption of blanket licensing procedures, by sub-band or service, as appropriate.

Respectfully submitted,

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March 5, 1996

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