

DOCKET FILE COPY ORIGINAL ORIGINAL

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

RECEIVED

SEP 24 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

COMMENTS OF PANAMSAT CORPORATION

PanAmSat Corporation ("PanAmSat"), by its attorneys, hereby responds to the Public Notice released September 5, 1997 requesting further comment on the pending proposals for blanket licensing of satellite earth stations operating in the 17.7-20.2 and 27.5-30.0 GHz frequency bands.

PanAmSat supports the satellite industry's proposal to permit the blanket licensing of certain Geostationary Orbit/Fixed Satellite Service ("GSO/FSS") earth stations operating in the 19.7-20.2 GHz, 28.35-28.6 GHz, and 29.25-30.0 GHz bands. In addition, PanAmSat concurs that some transceivers operating in the 17.7-18.8 GHz band would benefit from blanket licensing and agrees that a separate effort should be undertaken to develop sharing criteria and a blanket licensing proposal for this band.¹

While Ka-Band GSO/FSS systems will be used in part to satisfy additional demand for services presently offered via C- and Ku-Band FSS systems, they also will be used to provide a variety of new services. As discussed in the Petition for Rulemaking filed by Lockheed Martin Corporation, AT&T Corp., Hughes Communications, Inc., Loral Space & Communication, Ltd., and GE American Communications, Inc. (collectively, the "Petitioners") on December 23, 1996, many of these new services will involve the deployment of large numbers of transceivers. For these offerings, a requirement that transceivers be individually licensed would impose

¹ If blanket licensing for transceivers operating in the remainder of the 17.7-20.2 GHz and 27.5-30.0 GHz bands also is proposed, as requested by Teledesic, the effort to develop sharing and licensing criteria for these additional bands also should proceed on a separate track in light of the different, and potentially more complex, sharing scenarios presented by these bands.

No. of Copies rec'd 027
LIB. ACODE. FB

substantial and unnecessary costs and delays and, as a result, would restrict the development of these services and harm both satellite operators and end users.

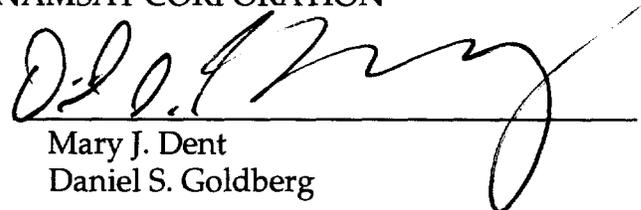
The International Bureau's recent decisions licensing thirteen companies to construct, launch, and operate Ka-Band GSO/FSS systems adds a new sense of urgency to the proposal for blanket licensing. Licensees are now actively developing their Ka-Band GSO/FSS systems and defining their offerings. As a result, both the licensees and their potential customers will benefit from the prompt adoption of rules specifying the conditions under which blanket licensing is permissible and the technical characteristics that transceivers must satisfy in order to be eligible for blanket licensing.

PanAmSat, therefore, joins the Petitioners in urging the Commission promptly to issue a Notice of Proposed Rulemaking proposing that certain transceivers operating in the 19.7-20.2 GHz, 28.35-28.6 GHz, and 29.25-30.0 GHz bands be eligible for blanket licensing, and requesting that the affected GSO/FSS licensees and future GSO Ka-band applicants create an informal Industry Working Group to define which Ka-band receivers will be eligible for blanket licensing and what technical rules these transceivers will be required to satisfy. In addition, PanAmSat joins the Petitioners in urging the Commission to take steps to promote the development of sharing criteria for the 17.7-18.8 GHz band that will make it possible for some transceivers operating in this band also to be licensed on a blanket basis.

Respectfully submitted,

PANAMSAT CORPORATION

By:


Mary J. Dent
Daniel S. Goldberg

GOLDBERG, GODLES, WIENER & WRIGHT
1229 Nineteenth Street, N.W.
Washington, D.C. 20036
(202) 429-4900

Its Attorneys

September 24, 1997