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Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

SUPPLEMENTAL COMMENTS OF GE AMERICAN COMMUNICATIONS, INC.

GE American Communications, Inc. ("GE Americom"), by its attorneys, hereby responds to the Commission's Public Notice requesting further comments in the above-captioned proceeding. See Public Notice, IN report No. 97-27 (released Sept. 5, 1997)("Public Notice"). GE Americom is one of the parties that has petitioned the Commission to conduct this proceeding to establish rules for the routine blanket licensing of large numbers of small antenna earth stations operating in the Ka-band. GE Americom also holds an authorization for its GE*Star Ka-Band global satellite system.

Blanket Licensing

The Public Notice requests further comment on two issues. First, the Commission solicits views on the appropriateness of instituting blanket licensing procedures for Ka-Band systems. GE Americom's views on this point already are represented in the original Petition for Rulemaking and the joint reply comments of the petitioners. For present purposes, we only wish to reemphasize that blanket licensing is central to fulfillment of the national and international networking plans for which Ka-band satellite systems have been authorized. The GE*Star

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system, for example, is designed to support wideband digital data, video and voice services among customer premises, free of the constraints inherent in the terrestrial infrastructure. Business users will enjoy improved telecommunications for a wide array of applications, including high speed data and internet access, videoconferencing, and imaging. The GE*Star system also will provide improved connectivity to residences for home office, internet and entertainment purposes. Thus, consumers as well as businesses will benefit from Ka-band technology.

A central element of the GE*Star system is the earth station to be located at the customer premise. The promise of Ka-Band recognized in the Commission's recent allocation of this spectrum will not be met if customers cannot deploy earth stations quickly, with a minimum of paperwork. Commercial VSAT networks would not be as successful and efficient as they are today if end user terminals required licensing on an antenna-by-antenna basis. The fees associated with such licensing alone would be a significant barrier to deployment. Similarly, the Commission would find its own resources unnecessarily stretched by such an administratively burdensome process.

The VSAT blanket licensing rules have been a major success. Similar rules are crucial to the development of Ka-band satellite services. We believe the record in this proceeding already fully confirms that blanket licensing rules are necessary.

Sharing with Fixed Terrestrial Services

The Public Notice also requests comment on sharing between Fixed Service and Satellite Service stations in the 17.7-19.7 GHz band. GE Americom fully agrees that these issues must be addressed to afford appropriate protection to satellite operations. However, we indicated in the Petition for Rulemaking that such issues are best addressed separately from this proceeding. To date no terrestrial service users have filed comments disagreeing with this approach. GE Americom will review the comments that the Commission receives on this point today, and reserves the right to file a supplemental reply if new positions are stated.

Respectfully submitted,

GE American Communications, Inc.

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CERTIFICATE OF SERVICE

I, Patricia Green, hereby certify that on this 24th day of September, 1997, copies of the foregoing "Supplemental Comments of GE American Communications, Inc." were mailed, postage prepaid, to the following:

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