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October 22, 1997

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Ms. Linda Dubroof, Legal Advisor  
Planning and Negotiations Division  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W.  
Washington, D.C. 20554

REC-100  
OCT 28 1997  
COMMUNICATIONS DIVISION

**RE: Blanket Licensing of Satellite Earth Stations in the 17.7-20.2 GHz and 27.5-30.0 GHz Frequency Bands, IN Report No. 97-27, RM 9005**

Dear Linda:

AirTouch Communications, Inc. ("AirTouch"),<sup>1</sup> is writing this letter to support those parties who oppose the grant of blanket licensing for satellite earth stations that will operate on the above-referenced frequencies, and to support efforts to develop effective spectrum sharing procedures. This proceeding is important to AirTouch in that its subsidiaries and affiliates operate nearly 300 domestic fixed point-to-point microwave links in the 18 GHz frequency band.

As a number of parties have correctly explained, implementation of blanket licensing in shared bands is certainly not in the public interest. This is because inter-service coordination between fixed services and FSS is impossible if FSS service providers are granted blanket licenses that do not require them to identify specific locations or users. As a result, blanket licensing of FSS would effectively exempt FSS users from prior coordination requirements, while relegating fixed service users to a secondary status.

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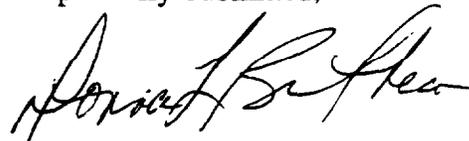
<sup>1</sup> AirTouch Communications has subsidiaries and affiliates that operate, or plan to operate, cellular, paging, and satellite services throughout the U.S. and abroad.

Such treatment of fixed services is not in the public interest. The licenses held by AirTouch in this band are used to carry telecommunications traffic from customer locations to AirTouch's network and between points in AirTouch's wireless network. These microwave links are a critically important element of the facilities providing for essential communications needs, inter alia, E911. Consumer demand for cellular and PCS is growing, making the demand for point-to-point links increase substantially. Measures such as the blanket licensing of FSS creates the potential for an interference ridden environment, causing disruption to cellular and PCS services and are therefore not in the public interest.

AirTouch believes the Commission should reject requests for blanket licensing of FSS earth stations in these bands and, instead, should focus on the original issue in this proceeding: appropriate sharing and coordination. The best approach to such coordination issues is to rely on industry groups working under Commission oversight. Spectrum sharing discussions should begin with the premise that new FSS providers seeking to license earth stations in this band must bear the burden of avoiding interference with existing users.

We appreciate this opportunity to have these views considered as part of this proceeding. Should you have any questions, please feel free to call me at (202) 293-4957.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Donna L. Bethea". The signature is fluid and cursive, with the first name "Donna" being the most prominent.

Donna L. Bethea