

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

In the Matter of)	
)	
2000 Biennial Regulatory Review -)	IB Docket No. 00-248
Streamlining and Other Revisions of Part 25))	
of the Commission's Rules Governing the)	
Licensing of, and Spectrum Usage by, Satellite)	
Network Earth Stations and Space Stations)	

COMMENTS OF WORLDCOM, INC.

WorldCom, Inc. ("WorldCom") hereby submits its Comments in response to the Commission's *Notice of Proposed Rule Making*¹ in the above-referenced proceeding. In its *Notice*, the Commission sought comment on a number of proposals for streamlining its Part 25 rules, which govern the processing of earth station applications.

The Commission states that the purpose of its proposals is to reduce the burdens on earth station operators seeking routine authorizations and to streamline the process for non-routine earth station applications. WorldCom supports these goals, and applauds the Commission's efforts to streamline its rules and reduce burdens on earth station licensees. WorldCom holds licenses for numerous earth stations, which it uses to provide its domestic and international voice and data service offerings.

WorldCom particularly supports the Commission's proposals to (a) extend the license period for earth station licenses from 10 to 15 years, (b) permit multiple hub stations under a single VSAT network license, and (c) clarify the distinction between

¹ In the Matter of 2000 Biennial Regulatory Review – Streamlining and Other Revisions of Part 25 of the Commission's Rules Governing the Licensing of, and Usage by, Satellite Network Earth Stations and Space Stations, IB Docket No. 00-248, *Notice of Proposed Rule Making*, FCC 00-435, Released December 14, 2000 ("Notice").

major and minor earth station modifications. WorldCom also supports, but requests clarification of, the Commission's proposal to establish a time schedule for satellite operators to address coordination issues.

I. WorldCom Supports Extension of the Earth Station License Term to 15 Years

Section 25.121 of the Commission's Rules currently states that earth station license terms may not exceed 10 years.² In the *Notice*, the Commission proposes to extend the license terms for all earth stations and the registration terms for receive-only earth stations to 15 years.³ WorldCom supports this proposal and believes that it will reduce administrative burdens both on licensees and on the Commission.

WorldCom typically retains its earth station facilities and licenses for extended periods of time and believes that other licensees do so as well. It serves no purpose, therefore, to require frequent renewals, especially since renewals are generally routine filings. Licensees will still be able to request modification of licenses during the license term if an earth station's specifications change, and will be able to relinquish licenses if they are not needed for the entire license term. This proposal will simply reduce the number of renewal requests which licensees must file, which will provide relief from an administrative burden on licensees and on the Commission.

² 47 C.F.R. 25.121.

³ *Notice* at paragraphs 44-45.

II. WorldCom Supports Licensing Multiple Hub Stations Under One VSAT License

The Commission has proposed revising Section 25.134 of its Rules to permit licensing of multiple VSAT hub stations under a single VSAT network license.⁴

WorldCom supports this proposal. WorldCom operates VSAT networks for several large customers, including U.S. government agencies, and anticipates additional demand for these systems in the future. In the event that these systems require multiple hub stations, it will reduce administrative burdens and costs to WorldCom and its customers if these stations can be licensed through one blanket license.

III. WorldCom Supports the Commission's Proposal to Clarify the Distinction Between Major and Minor Modifications

Section 25.118 of the Commission's Rules allows earth station licensees to make certain minor license modifications without prior Commission approval, as long as the Commission is notified within 30 days of the modification. The *Notice* proposes to revise Sections 25.117 and 25.118 to clarify which modifications qualify as "minor," and which are considered "major." WorldCom supports this proposal, as the current rules are unclear as to whether certain modifications are considered major or minor.

IV. WorldCom Supports, but Requests Clarification of, the Commission's Proposal to Establish a Schedule for Satellite Operators to Address Coordination Issues

Currently, non-routine earth station applications are placed on Public Notice, and the public is provided 30 days to comment and notify the Commission of any potential interference from these stations. In the *Notice*, the Commission proposes to retain this rule, but also to establish a 60 day deadline from the date comments are due for satellite operators to notify the Commission staff that they have resolved all outstanding

⁴ *Notice* at paragraph 58.

coordination issues that were identified during the 30 day comment period. After the 60 day deadline, the Commission would authorize the earth station to communicate at its requested higher power levels with all satellites for which it has submitted affidavits, and for which there are no unresolved objections to the application.⁵

WorldCom supports this proposal to the extent that it promotes swifter resolution of coordination issues and results in the expedited processing of earth station applications. If this proposal is adopted, however, WorldCom requests that the Commission clarify several aspects of the proposal. First, the *Notice* only discusses objections by satellite operators, so it is unclear whether the same process would be applied to objections from other parties. Second, WorldCom requests that the Commission clarify that, if there are no objections to an application, it will be granted after the 30 day Public Notice period, without having to wait the additional 60 days.

Finally, WorldCom requests clarification regarding objections that are not resolved within the 60 day period. The Commission does not specify whether it will take any measures to ensure that these objections are resolved in a timely manner. WorldCom has had difficulty in the past obtaining information or responses from satellite operators, and therefore suggests that such a mechanism be implemented. In addition, WorldCom requests clarification of the process for adding to a license satellites with which coordination issues are resolved after the 60 day period. Since these satellites would have been part of the initial application, there should be an abbreviated mechanism for adding them to the license later, such as the minor modification process.

⁵ *Notice* at paragraph 35.

V. Conclusion

For the reasons stated above, WorldCom supports the Commission's proposals to streamline its Part 25 earth station licensing rules, subject to the clarifications specified in these Comments.

Respectfully submitted,

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