

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

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 Spectrum Usage by, Satellite Network
Earth Stations and Space Stations

IB Docket No. 00-248

COMMENTS OF LORAL SPACE & COMMUNICATIONS LTD.

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Loral Space & Communications Ltd. (“Loral”), by its attorneys, offers the following comments in response to the Notice of Proposed Rulemaking in the above-captioned proceeding.¹

I. INTRODUCTION AND SUMMARY

Loral, through its subsidiaries, manufactures and operates geosynchronous and low-earth-orbit satellite systems and develops satellite-based networks for the provision of an array of communications and information services. Loral is organized in three operating business units: broadband data services (Loral CyberStar), satellite manufacturing and technology (Space Systems/Loral), and fixed satellite services (Loral Skynet, Satmex, Europe*Star and the Loral Global Alliance). Loral and its business units hold FCC licenses to launch and operate satellite systems in the C-, Ka- and Ku-bands, as well as numerous earth station licenses.

¹ *In re* 2000 Biennial Regulatory Review — 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, IB Dkt. No. 00-248, *Notice of Proposed Rulemaking*, FCC 00-435 (rel. Dec. 14, 2000) [hereinafter *Streamlining NPRM* or “the NPRM”].

Loral supports the Commission's objective of streamlining the Part 25 rules governing satellite service operations, but suggests the following changes to the Commission's proposals that will enhance the streamlining process and help protect satellite operators from harmful interference:

- Loral supports the Commission's proposed alternatives to the burdensome ASIA analysis, but suggests that the Commission clarify the coordination process by specifically stating that a certification that coordination has been completed must be filed with the earth station application, with an exception for coordination with foreign-licensed satellites. The Commission should also emphasize that earth station and satellite operators must take steps to remedy any interference that does occur, and should not grant ALSAT status to non-routine applicants using either proposed alternative.
- The Commission should clarify that it will grant only those applications that are uncontested at the close of the 60-day negotiation period and state that it will deny those applications that remain uncoordinated absent some agreement between the negotiating parties. Loral supports requiring applicants to submit antenna gain patterns with their applications.
- The Commission should increase the downlink power density limits for routine licensing of VSAT networks from +6 dBw/4 kHz to +9 dBw/4 kHz, but should make no other changes to the limits.
- The Commission should not require VSAT networks employing Aloha access protocols to operate at reduced power. Loral is not aware of any unacceptable interference from the current levels and believes that this proposal is unnecessary.

- The Commission should model FCC Form 312 after the Wireless Bureau's Form 601, by requiring the filing of a main form and action-specific schedules.
- The Commission should not require routine earth stations licensees to apply for a major modification when they seek to add ALSAT to a license that already lists a U.S.-licensed satellite as a point of communication. Also, the Commission should streamline the modification process for fully supported and uncontested applications to increase EIRP or transmit power levels within routine parameters.
- Loral supports mandatory electronic filing for all applications, and the Commission's efforts to delete or update outdated portions of Part 25.
- Loral suggests the Commission use this proceeding as an opportunity (1) to eliminate Section 25.131(j) and thereby remove the inconsistency of requiring receive-only earth stations operating with a non-U.S.-licensed satellite on the Permitted Space Station List to obtain a separate license, and (2) to modify its rules on transfers of control and assignments of satellite authorizations to eliminate the need for prior approval of *pro forma* transactions.

Loral's suggestions will assist the Commission in implementing streamlined Part 25 procedures that improve the application and authorization process for all parties involved.

II. STREAMLINING NON-ROUTINE EARTH STATION LICENSING PROCESSES

The Commission has proposed an extensive revision of the licensing process for non-routine earth stations. Loral requests that the Commission include in its final rules a number of details and clarifications that will make a revised licensing process work more smoothly.

A. Loral Supports a Streamlined Licensing Process for Non-Routine Earth Station Applications.

This proceeding seeks to simplify the process by which non-routine earth stations may be licensed to operate in a two-degree spacing environment without causing unacceptable interference to adjacent networks. Currently, applicants who seek to operate non-routine earth stations must complete the burdensome Adjacent Satellite Interference Analysis (“ASIA”) before the Commission will license these earth stations. The Commission has proposed that these applicants may instead demonstrate compatibility with the two-degree spacing environment through two alternative methods: (1) reducing transmit power to the extent of the antenna non-compliance, or (2) submitting “affidavits” from the satellite operator(s) that will serve the earth station, demonstrating that the operator(s) is aware of the proposed non-routine earth station operations and has reflected these non-routine operations in coordination agreements with other satellite operators. Loral supports the Commission’s proposed alternatives, but suggests clarifications or alterations to the procedures that will facilitate the application and coordination process.

1. *Allowing an applicant to operate at reduced power levels should not increase harmful interference with adjacent satellites.*

Allowing an applicant to demonstrate compliance by reducing transmit power levels will not result in harmful interference and will afford operators the flexibility to design and deploy advanced earth stations and innovative new satellite services. The Commission has previously adopted this approach on a case-by-case basis with no harmful effects. For example, a non-routine earth station at Hawley, Pennsylvania, has been licensed to operate at reduced power

levels for at least 15 years with no evidence of harmful interference.² Therefore, Loral supports the Commission's proposal to allow non-routine earth station applicants to demonstrate compliance with reduced power levels, rather than requiring the cumbersome ASIA demonstration.

2. *The proposed affidavit process, with some alterations, will improve licensing for non-routine earth stations.*

Loral also supports, with some suggested alterations, the Commission's second proposed alternative to the ASIA process. Non-routine earth stations should be permitted to operate at higher power levels if such operations can be coordinated with the affected satellite operators. The Commission proposes to accomplish this by requiring an applicant to file a statement from each satellite operator with which it wishes to communicate, stating that the operator has completed coordination with existing satellite operations and will coordinate with future adjacent satellites.³ Loral believes that, if properly implemented, this process can be an adequate first step to licensing non-routine earth stations that will not cause harmful interference. However, the Commission's proposal should be clarified.

- a. The Commission should not use the legal term "affidavit" to describe the certification that it requires from satellite operators.

In its final implementation of the proposed procedure, the Commission should replace references to "affidavits" with the term "certifications." Especially when dealing with foreign entities, the term "affidavit" implies a legal document that must be notarized and satisfy other formal legal requirements. Because the Commission requires only a statement from the satellite

² See, e.g., American Telephone & Telegraph, Authorization for Renewal of License to Operate Fixed Earth Station WB30, File No. SES-RWL-19850419-02768 (granted July 5, 1985).

³ See *Streamlining NPRM*, *supra* note 1, at ¶¶ 20–24.

operator that it has satisfied the Commission's requirements, it should use the terms "certification" or "engineering certification," which more accurately describes the document the Commission requires.

- b. The Commission should specify that coordination with adjacent satellite operators must be completed prior to submitting an application.

The Commission should specify that an earth station applicant must submit the certifications with the application and make clear that it will not accept applications for which coordination with satellites within six degrees has not been completed. The success of the streamlined procedure for non-routine earth stations depends on the degree to which affected satellite operators are informed, prior to the public notice period, that pending earth station operations may affect their satellite operations. Without requiring that the coordination process be completed before filing, and that the certifications be filed with the application, the procedure creates too great a risk that the most seriously affected satellite operators will be required to use the public notice period to coordinate operations, thus prolonging coordination and failing to remedy the problem of indefinitely pending applications that the Commission seeks to resolve.

The Commission should recognize, however, that coordination negotiations with foreign-licensed satellites tend to take longer to complete than the more common coordinations between U.S.-licensed satellites. The Commission should acknowledge this distinction by allowing for some flexibility with respect to the certifications from satellite operators involved in such negotiations. To the extent that an operator is being unduly delayed by the coordination process with a specific adjacent operator, it should be allowed to file its application and state in its certification that coordination negotiations with the foreign-licensed satellite are underway and that it expects these negotiations will be complete within a reasonable time. Earth station

applicants should be allowed to file their applications with these certifications as an exception to the requirement that all coordination negotiations be completed prior to application.

3. *The Commission should implement the proposals in this proceeding with a degree of caution for the harmful interference that may result.*

The Commission has proposed significant changes in the rules to permit licensing of non-routine earth stations. While Loral supports this idea, the Commission should proceed with some degree of caution in implementing the details of this proposal. Specifically, (1) the Commission should emphasize that, if harmful interference occurs, the earth station applicant and the satellite operators with which it communicates will take all necessary steps to remedy the harm, and (2) until it is clear how well this process will work, the Commission should not grant ALSAT status to non-routine earth station applicants who use either of the proposed options to receive a license.⁴

B. The Commission's Proposed Public Notice and Coordination Process May Place Too Much of a Burden on Satellite Operators Unless it is Clarified.

The *Streamlining NPRM* introduces two sets of issues in its proposed licensing process for non-routine earth stations. The first issue, discussed above, is the adequacy of the demonstration of reduced power levels or of the certifications to protect from harmful interference. The second, however, is the clarity with which the Commission has enumerated the steps following the applicant's submission of an application.

The Commission has proposed that, after reducing power levels or obtaining certifications from satellite operators, the earth station applicant will file an application that allows the Commission to describe the non-conforming earth station operations in detail in a

⁴ The Commission should adopt the relaxed standards discussed below, and thereafter an increased number of stations will be considered routine and thus eligible for ALSAT status.

public notice. Other affected satellite operators will then have the opportunity to file comments or petitions to deny regarding the application, and to attempt coordination negotiations. The Commission has established a schedule to ensure that the satellite operators address coordination issues in a timely fashion. Loral asks that the Commission clarify the operation of this schedule and include procedures that will address some of the issues that may arise.

1. *The Commission should clarify the steps it will take to grant the application following the negotiation period.*

According to the NPRM, the public will continue to have 30 days after public notice to comment and to notify the Commission of any potential interference. Satellite operators will have 60 days from the date comments are due to notify the Commission staff that they have resolved all outstanding coordination issues.

- a. Affected satellite operators should not be required to file formal comments or petitions to deny to trigger the negotiation period.

Loral asks that the Commission clarify that affected parties need not file formal comments or petitions to deny during the 30-day period. The Commission should clarify that an informal notification to the Commission that coordination negotiations are ongoing will also trigger the 60-day negotiation period. This will ease the burden on satellite operators.

- b. The Commission's proposed 60-day negotiation period will be adequate to conclude attainable coordination negotiations.

As indicated above, the Commission can reduce delay in licensing by requiring that all coordination with satellites within six degrees be concluded ahead of time and that the coordination certifications be filed with the application. However, it will occasionally be necessary for further negotiations to take place during the 60-day period the Commission has provided. Loral supports the Commission's proposal, and believes that 60 days will be an

adequate length of time to complete these negotiations. If the operator cannot reach an agreement within the 60 days allotted, the Commission is then justified in denying the application.

- c. The Commission should clarify that, after the negotiation period has expired, it will grant only those applications for which there are no unresolved issues.

After the 60-day deadline, it appears that the Commission will grant the earth station application to communicate at its requested higher power levels with all satellites for which it has submitted certifications, and for which there are no unresolved objections to the application. However, the NPRM also states that the Commission “will not need to delay action on a license application merely because the space station operator has not yet completed coordination agreements with all potentially affected adjacent satellite system operators.”⁵ The Commission should assert, unambiguously, that it will grant only the applications for which there are no unresolved objections at the expiration of the negotiation period.

- d. After the negotiation period has expired, the Commission should deny those applications that remain unresolved, absent agreement by parties to ongoing negotiations.

The NPRM does not specify what will be done with the contested applications. Coordination negotiations continue to be tempered by the Commission’s policy that space station operators have the obligation to negotiate in good faith, which the Commission recently reiterated in its *Columbia* decision.⁶ Because of this obligation, coordination negotiations that remain unresolved following the 60-day negotiation period are likely to suffer from engineering difficulties that require the Commission to deny those applications. Therefore, the Commission

⁵ *Streamlining NPRM*, *supra* note 1, at ¶ 36.

⁶ *See In re Application of Columbia Communications Corp.*, 3-SAT-P/LA-96, *Order and Authorization*, 14 FCC Rcd. 3318, 3328 ¶ 29 (1999). This obligation remains uncodified.

should also assert that it will deny those earth station applications that remain unresolved following the negotiation period, absent agreement by the parties involved in the ongoing coordination negotiations.

2. *The Commission is correct in requiring the submission of antenna gain patterns with the application.*

Loral supports the Commission's proposal to require applicants to include a copy of antenna gain patterns when they seek authority to use a non-routine antenna as a necessary part of the public notice process. Because the process places an onus on affected satellite operators to review public notices to discern whether an earth station will cause harmful interference with their systems, it is imperative that these operators have the broadest possible knowledge about the proposed earth station.

III. RELAXATION OF CURRENT REQUIREMENTS

A. Instead of Broad Changes to Earth Station Power and Power Density Limits, the Commission Should Implement Only a Modest Increase in Downlink Power Density Limits for VSAT Networks.

Loral supports an increase in downlink power density levels for VSAT services, but believes the Commission should not change any other power limits.⁷ Specifically, Loral supports increasing the downlink power density limit from +6 dBw/4 kHz to +9 dBw/4 kHz for routine licensing of VSAT antennas operating in the Ku-band. This modest increase will facilitate the deployment of millions of consumer VSAT terminals to support broadband consumer applications. It will enable a larger number of applications to be approved under the routine licensing regime and continue to give the satellite operators the flexibility to resolve other difficult inter-satellite coordination issues.

⁷ See *Streamlining NPRM*, *supra* note 1, at ¶¶ 39–41.

Otherwise, the current limits have served the domestic satellite industry well as new services have developed. Because these limits are fairly conservative, they enable the satellite operators to accommodate non-conforming earth station applications. The existing thresholds give the space station operators a margin for negotiations. Relaxation of these rules beyond the proposed +9 dBw/4 kHz will eliminate much of this margin and limit the satellite operators' ability to coordinate such non-conforming earth station applications.

Loral recognizes that, under its proposal, the "noise floor" will increase at a time when new applications aimed at the consumer and small business markets could bring about the proliferation of several million previously non-conforming antennas. Because there is no way to predict how the inter-satellite interference environment will change as a result of these independent developments, Loral urges the Commission to carefully and thoroughly consider any proposals to relax existing power limits. Loral is concerned that any such decision, if made prematurely, may result in unacceptable interference given the large numbers of antennas involved.

IV. VSAT LICENSING ISSUES

A. The Commission Should Not Require VSAT Networks Employing Aloha Access Protocols to Operate at Reduced Power.

The Commission has proposed amendments to the rules that would require VSAT networks employing Aloha access protocols to reduce the power transmitted to the satellite by at least 3dB.⁸ Loral believes that this proposal may be unnecessary. For several years, Loral has provided transponder capacity to operators of VSAT networks that utilize this protocol, among

⁸ See *Streamlining NPRM*, *supra* note 1, at ¶¶ 55–56.

others. Loral is not aware of any reported incidents of unacceptable interference attributable to the operation of these networks at the current “blanket licensing” levels.

V. STREAMLINING OF FILING REQUIREMENTS

A. The Commission Should Replace the Current Satellite Licensing Forms With One Main Form and Action-Specific Schedules.

Loral agrees that redesignating FCC Forms 405 and 701 as part of the Form 312 series is appropriate. Loral thinks the creation of Form 312-S is also an improvement on the current format. Loral believes, however, that the Commission could further improve the filing process by adopting procedures similar to those used in the Wireless Bureau for its Form 601. In the wireless arena, one application form is the basis for all wireless filings, with schedules appended to the main form for various procedures and wireless services. To adopt this approach for satellite licensing, the Commission would need to revise question 17 on the current FCC Form 312, to provide check boxes that identify which of the available schedules would be attached. Such a revision would incorporate the Commission’s proposed Forms 312-R, 312-M and 312-S not as separate documents, but as schedules to the 312 Main Form.

The Commission’s actions in this area will go a long way toward simplifying the filing process. A main form accompanied by schedules will reduce the amount of duplicative information the Commission must receive and process, and will make administration easier for both the applicant and Commission staff.

B. The Commission Should Not Require Satellite Service Applicants to Specify Whether They Will Operate as Common Carriers or Non-Common Carriers.

Currently, the Commission requires applicants who complete Form 312 to note in question 21 whether they will operate as a common carrier or a non-common carrier. Loral questions whether this distinction continues to be relevant, and suggests that the Commission delete this question from its revised Form 312.

VI. MISCELLANEOUS PROPOSALS

A. The Commission Should Make Amendments to the Modification Process for Certain Actions Taken by Earth Station Licensees.

Loral generally supports the Commission's efforts to clarify the distinction between minor and major modifications, but suggests some alterations to the modification process that will further streamline the procedures required for earth station applications.

1. *Existing routine earth stations should automatically be granted ALSAT authorization.*

Currently, routine earth stations do not receive ALSAT status unless they list ALSAT as the desired point of communication on their applications. However, routine earth stations that have satisfied the requirements for communication with a U.S.-licensed satellite clearly meet the requirements for ALSAT status, because there is no technical difference between communicating with one U.S.-licensed satellite or communicating with all of the satellites in ALSAT. It should not be necessary, therefore, for the Commission to require these earth stations to file applications for modification or amendments to their applications when they wish to add ALSAT status.

Existing routine earth stations, including those that will be considered routine under any relaxed standards that result from this proceeding, should be automatically permitted to communicate with ALSAT satellites, both U.S.-licensed and those on the Permitted Space Station List, subject to any conditions applicable to those satellites. The Commission could accomplish this with a declaratory ruling issued with the *Report and Order* in this proceeding, effective from the date the order is released, granting ALSAT authorization to qualifying earth stations.

2. *The Commission should provide a streamlined approval process for fully supported, uncontested modifications to increase power levels within routine parameters.*

In the proposed amendments to Section 25.118, the Commission requires routine earth station licensees who wish to increase their EIRP or transmit power within permitted routine levels to file a request for a major modification. Loral suggests that this process may be unduly burdensome. Currently, applicants must file terrestrial coordination documents with the application. Thereafter, the Commission places the application on public notice to ensure that all interested parties have been included in the coordination negotiations. To streamline requests for increases in EIRP or transmit power levels that fall within routine limits, Loral suggests the following: If an applicant has filed a fully supported application and it is placed on public notice and no one objects, the Commission should grant the license automatically upon expiration of the public notice period.

B. Mandatory Electronic Filing Should Be Implemented Because of the Numerous Benefits It Provides to the Application Process.

The Commission has proposed making electronic filing mandatory after June 1, 2002, for routine C- and Ku-band applications and for applications for assignments and transfers, and creating an Internet filing form to accept electronically filed petitions to deny or comments. Loral strongly supports the Commission's efforts to implement mandatory electronic filing. Not only will electronic filing reduce application processing time, it will be more cost effective for the Commission and for the satellite communications industry. However, the Commission should not limit electronic filing to C- and Ku-band applications. It should extend the mandatory requirement to Ka-band as well, and should require all earth station license renewals to be filed electronically. However, the Commission should continue to monitor the performance of the system and make timely improvements to correct problems as they are identified.

Electronic filing should enable the Commission to place all documents into a database available to the public at the International Bureau's website. Although some of the filed

information is available now, some documents are still unavailable or are not available in their original formats. Electronic filing will make it possible for the Commission to make all such documents available, in their original formats, without the need for data entry and its attendant possibility of error.

C. The Commission Should Delete Obsolete Sections of the Part 25 Rules.

Loral supports the Commission's efforts to update Part 25 by deleting or amending unnecessary and outdated rules. The Commission's actions to eliminate DARS and RDSS references and Subpart H, and to revise and update other sections in Part 25, are all appropriate at this time.

VII. OTHER STREAMLINING SUGGESTIONS

A. The Commission Should Modify Section 25.131(j) to Remove License Requirements for U.S. Earth Stations to Access Foreign Satellites on the Permitted Space Station List.

The Commission has requested comment on additional steps that can be taken to streamline the satellite application process. One rule that should be eliminated is the Section 25.131(j) requirement that a receive-only earth station operating with a non-U.S.-licensed satellite on the Permitted Space Station List obtain a separate license to operate this station.⁹ This requirement appears to be inconsistent with (i) the Commission's recent *Order on Reconsideration*, which determined that all U.S. earth stations with ALSAT licenses should be permitted to communicate with any non-U.S. satellite on the Permitted Space Station List

⁹ See 47 C.F.R. § 25.131(j). On January 4, 2000, Home Box Office filed a *Motion for Clarification and Declaratory Ruling* in IB Docket No. 96-111 requesting that the Commission clarify its rules to permit receive-only earth stations to receive signals from non-U.S. licensed satellites without obtaining a license. This request is pending. The Satellite Industry Association ("SIA") supported this change in its comments in the *Secondary Markets* proceeding. See Comments of the Satellite Industry Association to the *Notice of Proposed Rulemaking* in WT Dkt. No. 00-230, at 8-9 (Feb. 9, 2001).

without obtaining an additional authorization,¹⁰ and (ii) the Commission's rules, which do not require licenses for receive-only earth stations that operate with U.S.-licensed satellites.¹¹ Loral believes the Commission has overlooked this important aspect of the DISCO II Order, and that this proceeding is an appropriate time to address the resulting inconsistency.

B. The Commission Should Modify Its *Pro Forma* Application Rules.

Another step the Commission should take to streamline the satellite licensing process is to eliminate the need for prior approval of *pro forma* transfers of control or assignments of authorizations.¹² In the alternative, reducing the processing time for *pro forma* transfer of control and assignment applications will reduce transaction costs and regulatory uncertainties.

The financing of satellite services and facilities often involves corporate restructuring and reorganization that may require the *pro forma* transfer of control or assignment of Commission licenses. The Commission's current rules impose a significant obstacle to this process. *Pro forma* transfers of control or assignments of satellite and earth station licenses are in many ways treated in the same manner as non-*pro forma* transfers of control or assignments. Yet, in the *pro forma* case, no actual transfer of ultimate control occurs. Unlike some other services, the satellite form and the application processing fee are the same for *pro forma* assignments and transfers as they are for non-*pro forma* transfers or assignments of actual control, although the amount of work it

¹⁰ *In re* Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States, *First Order on Reconsideration*, 15 FCC Rcd. 7207 (1999).

¹¹ 47 C.F.R. § 25.131. Section 25.131(b) permits receive-only earth station operators that operate with U.S.-licensed satellites to register with the Commission in order to protect them from interference. 47 C.F.R. § 25.131(b).

¹² SIA proposed this amendment in the *Secondary Markets* proceeding. See Comments of the Satellite Industry Association to the *Notice of Proposed Rulemaking* in WT Dkt. No. 00-230, at 6–8 (Feb 9, 2001).

takes to process applications for these very different types of transactions is not at all equivalent. *Pro forma* applications do not go on public notice and the Commission's analysis should be cursory and routine. Despite this fact, *pro forma* transfer and assignment applications often take months to process.

The processing of *pro forma* transfer and assignment applications is an area where the wireless and other services have a significant advantage over the satellite service. Specifically, the Commission has used its authority to forbear from Section 310(d) requirements for *pro forma* transactions for certain wireless services.¹³ In that proceeding, the Commission noted that its "approval of *pro forma* assignments and transfers is not needed because such transactions, by their nature, do not change the underlying ownership or control of licensees that the Commission has already reviewed and approved."¹⁴ Such transactions are "considered presumptively in the public interest because no substantial change of control is involved."¹⁵ The Commission determined that a notification procedure would effectively and more efficiently permit it to carry out its objectives.

Loral recognizes that the Commission may have some difficulty in using its authority to forbear from Section 310(d) requirements in the case of satellite operators, most of which operate as non-common carriers. However, the Commission could utilize the grant stamp

¹³ See *In re* Federal Communications Bar Association's Petition for Forbearance from Section 310(d) of the Communications Act Regarding Non-Substantial Assignments of Wireless Licenses and Transfers of Control Involving Telecommunications Carriers and Personal Communications Industry Association's Broadband Personal Communications Services Alliance's Petition for Forbearance For Broadband Personal Communications Services, *Memorandum Opinion and Order*, 13 FCC Rcd. 6293 (1998).

¹⁴ *Id.* at ¶ 18.

¹⁵ *Id.*

procedures it currently uses to process other applications, including applications processed by the International Bureau for satellite and earth station applications for special temporary authority, *pro forma* transfers of control and assignments of Section 214 authorizations and certain undersea cable licenses.¹⁶ Loral also suggests that the FCC seek statutory authority to reduce the processing fee for *pro forma* transfer and assignment applications.

VIII. CONCLUSION

In conclusion, Loral supports the Commission's ongoing effort to streamline the earth station licensing process and other Part 25 rules. However, Loral believes that the Commission can make a number of amendments to its proposed streamlined rules that will improve the process and help to protect satellite operators from increased levels of harmful interference. For the foregoing reasons, Loral respectfully requests that the Commission adopt rules consistent with these comments.

¹⁶ The International Bureau adopted a grant stamp procedure in 1994 for approving Section 214 *pro forma* transfers of control and assignments and for approving requests for special temporary authority for international and domestic earth station use. *See* International Bureau Launches New Procedures, *Public Notice*, 1994 FCC LEXIS 5792 (Nov. 21, 1994). *See* Wireless Telecommunications Bureau and International Bureau Complete Review of Proposed Investment by Telefonos de Mexico, S.A. de C.V. in Parent of Cellular Communications of Puerto Rico, *Public Notice*, 15 FCC Rcd. 1227 (1999).

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