

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

In the Matter of)	
)	
Flexibility for Delivery)	IB Docket No. 01-185
of Communications by)	
Mobile Satellite Service Providers)	
in the 2 GHz Band, the L-Band and the)	
1.6/2.4 GHz Band)	
)	
Amendment of Section 2.106 of the)	ET Docket No. 95-18
Commission’s Rules to Allocate)	
Spectrum at 2 GHz for Use by)	
the Mobile Satellite Service)	

To: The Commission

REPLY COMMENTS OF THE NATIONAL ITFS ASSOCIATION

The National ITFS Association (“NIA”) submits these reply comments in the referenced proceeding initiated by *Notice of Proposed Rule Making*, FCC 01-225 (released August 17, 2001) (“NPRM”). In the NPRM, the Commission explores the possibility of giving Mobile Satellite Service (“MSS”) licensees additional flexibility to provide their services to the public through the operation of terrestrial facilities in the 2 GHz Band, the L-Band, and the 1.6/2.4 GHz Band.

National ITFS Association

The National ITFS Association, established in 1978, is a non-profit, professional organization of ITFS licensees, applicants and others interested in the Instructional Television Fixed Service. The goals of NIA are to gather and exchange information about ITFS, to act as a conduit for those seeking information or assistance about ITFS, and to represent the interests of

ITFS licensees and applicants. NIA and its members have participated in virtually every FCC proceeding affecting ITFS. It has an interest in this proceeding, which considers technical changes potentially having adverse interference effects on ITFS licensees.

Potential for Interference to ITFS Stations

Two principal proponents of flexibility for MSS licensees filed comments in this proceeding: Globalstar L.P. and L/Q Licensee, Inc. (“Globalstar”) and Constellation Communications Holdings, Inc. (“Constellation”). Each supports the FCC’s prompt approval of ancillary terrestrial facilities in each of the MSS frequency bands, including the Big LEO downlink band at 2483.5-2500 MHz, which is immediately adjacent to the lower end of the ITFS band (ITFS Channel A1 being 2500-2506 MHz). Neither proponent, however, adequately addresses the obvious potential for interference to ITFS operations.

Globalstar’s Comments, at p.9, states that interference into services adjacent to the Big LEO bands is unlikely. However, Globalstar discusses only potential interference to the Radio Astronomy Service and the Global Positioning System. Globalstar does not even acknowledge, much less address, the fact that the band is immediately adjacent to ITFS Channel A1.

Constellation’s Comments, at p. 37, concedes that some limits on transmit powers, antenna heights and out-of-band emissions may be needed to protect facilities operated in bands adjacent to MSS allocations. It goes on to suggest that technical standards should be the same as those applied in the adjacent allocations, thereby to provide the same level of protection from ancillary MSS base stations to adjacent band operations, as is afforded to the MSS ancillary facilities from facilities in adjacent bands. However, Constellation does not specifically address the potential interference to ITFS Channel A1 or the specific technical standards that would be necessary to protect ITFS Channel A1. Nor does it explain why its reciprocity approach is

appropriate in these circumstances, where a potential new use (MSS ancillary terrestrial facilities) is placed next to an existing, protected use (ITFS).

Discussion

NIA believes that the comments by Globalstar and Constellation do not adequately address the problem of interference to ITFS operations from a shift in the use of the Big LEO 2483.5 –2500 MHz band from satellite transmissions to terrestrial transmissions, including high power transmissions from locations that may be very near to ITFS receive sites or two-way hubs. Thus, at this point, there is no adequate legal or technical basis for the FCC to authorize ancillary terrestrial facilities in the 2483.5 – 2500 MHz band.

NIA has reviewed the comments being filed simultaneously by the Catholic Television Network (“CTN”), including the associated engineering statement by its consulting engineer, Hammett & Edison, Inc. NIA fully concurs with, and supports, CTN’s comments for the reasons stated therein.

Conclusion

For these reasons, the FCC should not authorize ancillary terrestrial facilities in the Big LEO 2483.5 – 2500 MHz, at least not until the problem of interference to ITFS operations in the adjacent band is satisfactorily solved.

Respectfully submitted,

NATIONAL ITFS ASSOCIATION

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of National ITFS Association was mailed this 13th day of November, 2001 to the following:

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