

LAW OFFICES
GOLDBERG, GODLES, WIENER & WRIGHT
1229 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036

HENRY GOLDBERG
JOSEPH A. GODLES
JONATHAN WIENER
SHERYL J. LINCOLN
MICHAEL A. McCOIN *
ERIC SCHWALB *

(202) 429-4900
TELECOPIER:
(202) 429-4912
e-mail: jwiener@g2w2.com

HENRIETTA WRIGHT
THOMAS G. GHERARDI, P.C.
COUNSEL
*Not Admitted in D.C.

November 20, 2001

Ms. Magalie R. Salas, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W. TW-A325
Washington, D.C. 20554

Re: IB Docket No. 00-248
Ex Parte

Dear Ms. Salas:

On November 19, 2001, Harold Ng of PanAmSat Corporation ("PanAmSat"), accompanied by the undersigned counsel, met with Thomas Tycz, Fern Jarmulnek, and Steven Spaeth of the International Bureau. In the meeting, PanAmSat distributed the enclosed draft of proposed rules that would implement some of the proposals PanAmSat made in its initial comments in this proceeding. The rules would apply to networks using small aperture antennas having a dimension of less than 1.2 meters in the geostationary orbit plane, and would require that: (1) remote stations be prevented from transmitting until they have received an authorizing signal from a network operations center; (2) the network operations center be capable of disabling the transmit capability of individual remote stations at all times; (3) the customer not be able to override this "transmit disable" command at the remote stations end; and (4) there be a means for tracing interference to individual remote stations.

Ms. Magalie R. Salas

November 20, 2001

Page 2

In response to questions raised by the International Bureau, PanAmSat clarified that its proposal would apply to "mesh" networks as well as to networks operated in a hub and spoke configuration. PanAmSat also explained that there are methods that can be used for tracing interference in networks employing access techniques such as ALOHA. For example, records can be kept showing the dates and times that particular frequencies are assigned to particular remote stations. If there is interference in a particular area at a particular time, the source of the interference can be identified by cross-checking the frequency of the interfering signal against the network operator's frequency assignment records.

Sincerely,

/s/ Joseph A. Godles

Joseph A. Godles
Attorney for PanAmSat Corporation

Attachment

cc: Thomas Tycz
Fern Jarmulnek
Steven Spaeth

25.271(c)(5) In the case of GSO/FSS network using small aperture antennas with dimension less than 1.2 meters in the GSO plane:

- (i) Network system equipment design must inhibit transmit capability of remote units until appropriate instruction is received from the central operations center;
- (ii) Network system equipment design must allow transmit capability to be disabled remotely from a central operations center at all times. Further, the equipment design must inhibit the remote terminal from being able to override the "transmit disable" function;
- (iii) Network system design shall include a means by which interference can be traced to individual remote stations. Such remote station tracing shall be capable of being performed promptly.