

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

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

COMMENTS OF GENERAL COMMUNICATION, INC.

General Communication, Inc. (“GCI”), by its undersigned attorney, submits these comments in response to the Further Notice of Proposed Rulemaking in the captioned proceeding (“Further Notice”).

GCI is an Alaska-based company providing competitive local and long distance voice, video and data communications services. With Alaska’s vast terrain, geography, climate, and low density, GCI has long relied on satellite services to provide long distance services throughout rural Alaska where fiber simply cannot be deployed. GCI also deploys earth stations extensively throughout Alaska in connection with its delivery of services pursuant to the universal service Schools and Libraries and Rural Health Care programs, as well as in the service of GCI’s own Internet service deployment. As a result, GCI has been licensed to deploy approximately 110 small C-band earth stations over the last eight years.

GCI urges the Commission to determine eligibility for routine processing according to whether the earth station meets the Commission’s antenna gain pattern rules, rather than when an antennas is greater than a minimum diameter. GCI has deployed 3.6 meter C-band antennas throughout its network. The earth stations routinely deployed by

GCI, manufactured by ViaSat, meet the antenna performance standards set forth under Section 25.209. The gain of this 3.6 meter antenna at 1.25° off-axis is approximately 26.6 dBi.

Under Section 25.212(d) of the Commission’s rules, applications for these earth stations are not treated as routine, however, simply because they are smaller than 4.5 meters. This means that with every application it files, GCI must submit the antenna gain patterns that demonstrate compliance. Because GCI uses the same antenna make and model, however, the submission—which is over 98 pages, with 72 pages of detailed antenna pattern information—is the same with each filing. Commission staff resources are thus dedicated to confirming compliance anew with every filing. This finding requires duplicative effort: once the make and model antenna is confirmed complaint, that finding should not change from application to application. While this staff effort is undertaken—or perhaps simply because routine processing is not permitted under the rules—grant of these applications themselves are delayed by this unnecessary processing step. The result is an unnecessary expenditure of Commission and applicant resources and unnecessary delay in the licensing of facilities, itself causing an unnecessary delay in the delivery of services.

Resources could be deployed more efficiently and services delivered to the public more quickly if 3.6 meters that satisfy the Commission’s technical and operating standards are treated as routine. GCI agrees that streamlining the application process for smaller earth stations will “expedite the provision of useful satellite services to the public, including the provision of Internet services to rural areas.”¹ Satellite earth stations are the

¹ Further Notice at ¶ 4.

cornerstone of GCI's rural Internet build-out plan, in which it provides high-speed services to rural Alaska villages at urban rates. GCI's schedule for deployment of equipment to provide such services is rigidly seasonal. The season for constructing and deploying new earth stations is strictly limited due to permafrost and equipment delivery limitations. GCI deploys earth stations in some of the most rural villages of Alaska, which are not accessible by road, and the ability to reach such villages even by plane can be quite limited in winter months. Thus, even the slightest application processing delay can result in deployment delays of several months or more.

Moreover, where antennas satisfy the existing technical standards, there is no increased risk of interference. The continuing requirement for frequency coordination guards against interference, even if the routine processing of smaller-diameter antennas encourages the deployment of such antennas with wider main beams.² The "routine processing" designation will permit the Commission to act more quickly on applications and avoid unnecessary delay of the delivery of useful satellite-based services to the public, especially in rural America. Thus, the public interest would be served by extending the "routine" treatment to such 3.6 meter antennas.

In addition to the ViaSat 3.6 meter antenna, GCI supports treating earth station applications as routine for any size antenna at such time as a specific make and model antenna has been shown to meet the operation requirements of Section 25.209 or the technical standards of Section 25.132. Once such a showing has been made, it serves the public interest in delivery of services without unnecessary delay and efficient

² Id. at ¶ 5 (noting that none of the Commission's proposals would affect the procedures for coordinating terrestrial wireless operations with FSS operations in shared bands).

administrative processes to treat the processing of applications to deploy and use such antennas as routine. GCI does not support, however, the proposal to extend blanket “routine” treatment to all antennas 2.7 meters and larger. A 2.7 meter antenna at 1.25 degrees is very close to a gain null; however, the first sidelobe peak occurs at 1.76 degrees, 3dB above that permitted under Section 25.209. This translates to a C/I_{uplink} from adjacent satellite uplinks of almost 3 dB. Assuming that the adjacent satellite uplinks are employing the maximum power densities allowed under Part 25, this poses a significant level of interference for an adjacent operator using a typical 16QAM carrier with a $\frac{3}{4}$ rate FEC and Reed-Solomon coding. For example, GCI runs its links with a 3 dB margin for all interference (uplink and downlink). The impact of this likely interference could be mitigated (and thus, routinely processed), however, if the 2.7 meter antennas were limited to digital SCPC services that run at 3 dB or greater Output Back-Off (“OBO”) from saturated transponder output. By contrast, 2.7 meter antennas that support analog video transport or wideband digital transmission that runs at less than 3 dB OBO from saturated transponder output must be required to demonstrate Section 25.209 compliance.

Finally, GCI supports a general rule in response to the difference in the potential for interference between the carriage of digitally modulated carriers and analog carriers. Analog uplinkers require greater power levels than more efficient digital carriers, and thus, pose a greater risk of interference as a general matter. On this basis, the Commission should extend routine treatment only for those earth station applications that are limited to digital carriers.

For these reasons, GCI supports modification of the Commission's rules governing earth station licensing as described herein.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I, Colleen A. Mulholland, do hereby certify that a copy of the foregoing Comments of General Communication, Inc. were sent as indicated this 10th day of March, 2002, to the following parties:

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