

Before the
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of:

Procedures To Govern the Use of Satellite)
Earth Stations on Board Vessels in the)
5925-6425 MHz/3700-4200 MHz Bands)
and 14.0-14.5 GHz/11.7-12.2 GHz Bands)

IB Docket No. 02-10
FCC No. 03-286

COMMENTS OF TACHYON NETWORKS INCORPORATED

Tachyon Networks Incorporated (hereinafter “Tachyon”) hereby provides its comments in response to the Notice of Proposed Rulemaking issued by the Commission in the captioned proceeding (hereinafter the “Notice”). In general, Tachyon supports the Commission’s initiative in this proceeding and urges the adoption of the proposed rule changes.

Tachyon is in the business of providing carrier-grade, broadband communications network solutions to large enterprises and government agencies utilizing leased Ku-band satellite capacity in combination with the Company’s proprietary ground-based technology. Tachyon’s broadband satellite networks replicate the “look and feel” of terrestrial networks through patented TCP/IP compatible signal processing and protocol software, encrypted traffic accelerators and quality of service (QoS) technologies, enabling high speed, reliable transmission that makes highly efficient use of the spectrum. Customers use Tachyon-provided networks to implement both permanent and transportable solutions for primary and backup broadband connectivity, with an emphasis on serving remote locations that are not served by terrestrial facilities.

Tachyon strongly supports the Commission's proposal to provide routine licensing of Ku-band VSAT systems operating with earth stations on board vessels (ESV's). Tachyon believes that expanding the possible operating scope of VSAT systems operating in these bands will serve the interests of end users by giving them additional service capabilities and options. Tachyon also believes this can be accomplished, as the Commission proposes, without resulting in harmful interference with other users of these FSS bands.

Although Tachyon has not previously participated in the Commission's inquiry related to this proposed licensing and has only recently become familiar with the current proposals, in Tachyon's view there is nothing in the Commission's proposed rules that would create problems for Tachyon in the provision of EVS services. However, Tachyon would urge the Commission to go as far as practical in extending the opportunity for expanded VSAT operations in these bands, rather than taking a unduly cautious approach.

Tachyon commends the Commission for this initiative and expects to be studying the Commission's proposals and issues identified, as well as the comments filed by others, with the intention of providing additional input in the reply round of comments.

Respectfully submitted,

TACHYON NETWORKS INCORPORATED

By: - F. Thomas Tuttle -

F. Thomas Tuttle
Senior Vice President, Legal Affairs and
Business Development

8133 Leesburg Pike, Suite 450
Vienna, Virginia 22182
703-821-9101 (ext. 14)
ttuttle@tachyon.net