

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

In the Matter of

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

IB Docket No. 02-10

REPLY COMMENTS OF INTELSAT GLOBAL SERVICE CORPORATION

Intelsat Global Service Corporation (“Intelsat”) hereby replies to
comments submitted in the above-captioned proceeding.

**I. The Commission Should Not Prohibit C-Band Operation of ESVs
Within 300 km of the U.S. Coastline**

In its comments, the Fixed Wireless Communications Coalition (“FWCC”) asserts that C-band operation of ESVs within 300km of the US coastline should be prohibited.¹ Intelsat strongly disagrees with the FWCC’s position on this issue. The feasibility of coordinating C-band ESV operations with FS operations has been demonstrated domestically and internationally and, indeed, is acknowledged in the comments submitted by the FWCC.² Therefore, a prohibition on ESV operations over

¹ See Comments of The Fixed Wireless Communications Coalition at 9, IB Docket No. 02-10 (filed Feb. 23, 2004) (“FWCC Comments”).

² See FWCC Comments at APPENDIX.

such a large area is neither prudent nor necessary to protect FS operations in the band and consequently does not serve the public interest.

II. Restricting ESV Operations to Vessels of 5000 Gross Tons or Larger is Not Justified

The FWCC proposes to allow the use of ESVs only on vessels of 5000 gross tons and larger.³ Intelsat believes that this proposal is unjustified. The size of the vessel does not directly affect the potential for interference. As such, the control of interference from ESV operations into FS operations should be achieved through other coordination measures, which take into account all relevant factors, rather than resorting to limiting the size of the vessel eligible to operate ESVs.

III. Transmission Parameters Rather Than Antenna Size Should Be Used to Control Interference

Intelsat agrees with Telenor⁴ that rather than imposing constraints on the minimum antenna size used by ESVs, the limitations should be focused on parameters that control interference levels, such as e.i.r.p. density. In the same vein, Intelsat agrees with Inmarsat⁵ that if a limit on the e.i.r.p. towards the horizon is imposed, the limitations on ESV antenna pointing are not necessary.

³ FWCC Comments at 13.

⁴ See Comments of Telenor Satellite Services, Inc. at 7, IB Docket No. 02-10 (filed Feb. 23, 2004).

⁵ See Comments of Inmarsat Ventures Ltd. at 22, IB Docket No. 02-10 (filed Feb. 23, 2004).

IV. A Certificate by the Operator of the Satellite Accessed by an ESV Operator Should Be Used to Demonstrate Compliance with Coordination Agreements

In its comments, Broadband Maritime, Inc. proposes that a technical demonstration of the ESV antenna's technical specifications' compliance with ITU Resolution 902 should be sufficient to show that no harmful interference to adjacent satellites will occur.⁶ Intelsat agrees with this comment, but also proposes that a certificate filed by the operator of the satellite accessed by the ESV operator should be used to demonstrate to the FCC that the use of ESV terminals will be in compliance with the applicable coordination agreements and will not cause harmful interference to adjacent satellites, as called for in ITU Resolution 902.

V. Coordinated C- band ESVs Should Be Given Co-primary Status

Intelsat agrees with Maritime Telecommunications Network, Inc. that coordinated ESVs operating in C-band should be given a co-primary status.⁷ If successfully coordinated, the ESV terminal is no different than any other FSS coordinated terminal and therefore should not be treated differently. Based on the same argument, Intelsat disagrees with Stratos' comment that coordinated C-band ESVs should not receive protection from future terrestrial operations.⁸ As a co-primary application, per ITU RR 5.AA16, C-band ESVs should be entitled to protection in the coordinated bands and should not be subject to spectrum limitations.

⁶ See Comments of Broadband Maritime, Inc. at 6, IB Docket No. 02-10 (filed Feb. 23, 2004).

⁷ See Comments of Maritime Telecommunications Network, Inc. at 15, IB Docket No. 02-10 (filed Feb. 23, 2004).

⁸ See Comments of Stratos Offshore Services Co. at i, IB Docket No. 02-10 (filed Feb. 23, 2004).

Intelsat disagrees with the FWCC's suggestion that special protection be given to FS operations due to the fact that they carry some critical infrastructure services. The FS operators should coordinate in good faith and the Commission should not shift the burden of achieving protection entirely to ESV operators.⁹ The C-band is allocated to commercial services generally and any special protection cannot be justified.

Respectfully submitted,

Intelsat Global Service Corporation

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⁹ FWCC Comments at 8-9.