

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON DC 20554-0001

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

REPLY COMMENTS OF  
NATIONAL SPECTRUM MANAGERS ASSOCIATION  
ON THE NOTICE OF PROPOSED RULEMAKING

The National Spectrum Managers Association ["NSMA"] respectfully submits the following Reply Comments in the above-captioned proceeding.

In light of our desire to improve the coordination efforts and the resulting improvement in spectrum utilization, the NSMA has a number of concerns with respect to the Comments that were filed on February 23, 2004 in response to the Notice of Proposed Rule Making ["Notice"].

PanAmSat Corporation ["PanAmSat"] states in its Comments to the Notice<sup>1</sup> that a more balanced solution could still be achieved by giving primary status to coordinated C-band ESVs by limiting the license term to a shorter duration than the fifteen years proposed for Ku-band ESVs. PanAmSat apparently is unaware of the procedures that frequency coordinators utilize in providing protection to a licensed facility. If a facility is licensed by the Commission as one with primary status, then the facility will have permanent coordination protection so long as the license is renewed on a timely basis. The term of the station license, whether it is one year or fifteen years, will have no effect on a primary station being able to maintain permanent coordination protection. If C-band ESVs were to receive co-primary status with fixed stations, then fixed stations operators would not be able to expand existing systems or

---

<sup>1</sup> Comments at 3

develop new systems that would conflict with the ESV station that had coordinated for a given area of operation irrespective of the license term.

Telenor Satellite Services, Inc. on behalf of itself and its affiliate Telenor Satellite Services AS [together, "Telenor"] state in its Comments to the Notice<sup>2</sup> that a 300-kilometer limit as an offshore coordination distance is wholly unnecessary to protect shore-based FS operators. Telenor apparently believes that an offshore coordination distance of only 5 kilometers will provide adequate protection to shore-based FS operators. Telenor appears to make this claim on the basis that only the main beam lobe [3 dB beam width] of the transmitting antenna affects the coordination computation. In fact, the full antenna pattern published by the manufacturer, which includes side lobe radiation information, is used. The actual coordination distance is derived in part from the earth station antenna gain toward the horizon, as referenced in Appendix 7 of the International Telecommunication Union ["ITU"] Radio Regulations. As an example, the actual coordination distance for an ESV in Los Angeles harbor works out to be 237 kilometers at an elevation angle of 5.6 to 47.5 degrees. The coordination distance would be even greater at a lower elevation angle as the gain toward the horizon increases. Furthermore, the 3 dB point is irrelevant to the level of interference protection. The gain toward the horizon is combined with other operating parameters to calculate the interference signal power level of the ESV into a fixed station. NSMA supports the coordination distance methodology developed by the ITU, or as an alternative, the minimum 300 kilometer distance offshore as proposed in the Notice.

The NSMA requests the Commission take these comments into account in its determination of rules governing the coordination and operation of ESVs.

By: \_\_\_\_\_

James Wolfson  
President - NSMA

4444 Westgrove Drive - Suite 395  
Addison, Texas 75001

March 24, 2004

---

<sup>2</sup> Comments at 5 and 6