



March 3, 2005

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Written Ex Parte Submission in ET Docket No. 04-352

Dear Ms. Dortch:

The Satellite Industry Association (SIA)¹ submits this written ex parte in the above captioned proceeding involving the Multi-band OFDM Alliance Special Interest Group (“MBOA-SIG”) request for waiver of the Commission’s ultra-wideband (“UWB”) rules. The SIA and its member companies urge the Commission to deny the request for waiver.

Late last year SIA filed comments in this proceeding raising our concerns about uncoordinated interference that goes beyond the levels of co-frequency interference envisioned in ITU-R Recommendations that would potentially degrade service entirely or to a level below what satellite operators have agreed to with their customers.²

While we stand by our interference concerns and reiterate their importance, SIA would also like to support the procedural issues raised by others in this proceeding. Allowing a waiver in this situation would result in a de facto change in UWB rules. The Commission has recognized the need for caution in this proceeding to protect against interference while UWB devices are still relatively new technology. SIA also notes the importance of waiting for the results of the Institute for Telecommunications Services study before granting any waivers that could potentially eat into the margin for interference that satellite operators have set aside to cope with interference from co-frequency sources.

In view of the above, SIA strongly opposes the MBOA-SIG waiver.

¹ The Satellite Industry Association (SIA) is a U.S.-based trade association representing the global commercial satellite industry on policy, regulatory, and legislative matters of common concern to its members. SIA Executive Members include: The Boeing Company; Globalstar LLC; Hughes Network Systems, Inc.; ICO Global Communications; Intelsat; Iridium Satellite LLC, Lockheed Martin Corp.; Loral Space & Communications Ltd.; Mobile Satellite Ventures LP; Northrop Grumman Corporation; PanAmSat Corporation; and SES Americom, Inc. SIA’s Associate Members include Eutelsat, Inmarsat, The DIRECTV Group, Stratos Global Corporation, and New Skies Satellites Inc.

² See Comments of SIA in ET Docket 04-352, September, 29, 2004.

Very truly yours,

A handwritten signature in black ink, appearing to read "David Cavossa". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

David A. Cavossa
Executive Director
Satellite Industry Association