

Before the
Federal Communications Commission
Washington, D.C. 20554

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

**PETITION FOR RECONSIDERATION OF
THE SATELLITE INDUSTRY ASSOCIATION**

The Satellite Industry Association (“SIA”), pursuant to Section 1.429 of the Commission’s rules, hereby petitions for reconsideration of the order in the above-captioned proceedings entitled Sixth Report and Order and Third Further Notice of Proposed Rulemaking (“6th R&O”).¹

SIA is a U.S.-based trade association providing worldwide representation of the leading satellite operators, service providers, manufacturers, launch services providers, remote sensing operators, and ground equipment suppliers. SIA is the unified voice of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business.²

This petition is limited to the Commission’s decision in the 6th R&O to begin the antenna gain pattern envelope at 1.5° off-axis within the GSO orbital arc for C-band and Ku-band earth stations and to address pointing error issues

¹ FCC 05-62 (March 15, 2005).

² SIA includes Executive Members: The Boeing Company; Globalstar LLC; Hughes Network Systems LLC; ICO Global Communications; Intelsat; Iridium Satellite LLC; Lockheed Martin Corp.; Loral Space & Communications Ltd.; Mobile Satellite Ventures; Northrop Grumman Corporation; PanAmSat Corporation and SES Americom, Inc. and Associate Members Eutelsat Inc., Inmarsat Ltd., New Skies Satellites Inc., Stratos Global Corporation, and The DirecTV Group.

simply by requiring “VSAT network operators to design their networks to stop transmissions when synchronization fails.”³ Although the Commission decided to begin the antenna gain pattern envelopes at 1.5°, it stayed the effective date of these requirements pending resolution of the off-axis EIRP issues discussed in the 3rd FNPRM.⁴

The Commission states that “setting the starting point of the antenna gain pattern envelope at 1.5° off-axis will limit potential interference into 2° separated satellites, and adequately account for potential pointing error of those earth station facilities”⁵. However, increasing the starting point of the antenna gain pattern envelope will also have the effect of facilitating the use of smaller transmit earth station antennas. Smaller earth station antennas are, in turn, typically prone to larger pointing errors than those of larger antennas. Consequently, mere compliance of the transmit earth station with the mask, for which off-axis angles are measured from the antenna main beam instead of from the direction of the wanted satellite as seen from the earth station, may no longer ensure the expected level of protection to adjacent satellites.

³ See ¶¶ 49 and 50 in 6th R&O.


⁴ See ¶50 in 6th R&O.

⁵ See ¶22 in 6th R&O.

Since the starting angle of 1.5° does not become effective until the resolution of the off-axis EIRP issues addressed in the 3rd FNPRM, SIA understands that this matter can be considered and resolved within the 3rd FNPRM. Accordingly, SIA is still discussing the best way of addressing this issue and intends to submit a specific proposal in its comments on the 3rd FNPRM. SIA respectfully requests that, on reconsideration, the Commission take into account, based on its resolution of the issues raised in the 3rd FNPRM, any changes that need to be made to the rules that were adopted in the 6th R&O.

Respectfully submitted,

SATELLITE INDUSTRY ASSOCIATION

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 Cavossa, Executive Director
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July 8, 2005