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PUBLIC SERVICE SATELLITE CONSORTIUM

600 Maryland Avenue, SW Suite 220 Washington, DC 20024 202-863-0890

November 6, 1990

Federal Communications Commission 1919 M Street, NW Washington, DC 20554

Attention: Office of the Secretary

Re: File Number 54-DSS-P/L-90

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Dear Secretary:

Enclosed please find an original and ten copies of the Statement of the Public Service Satellite Consortium (PSSC) in support of the Norris Satellite Communication, Inc.'s application for authority to construct, launch and operate a Ka-band satellite.

Sincerely,

Louis A. Bransford

President

Enclosure

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of the Application of)
Norris Satellite Communications, Inc.)File Nos. 54-DSS-P/L-90
For Authority to Construct, Launch and Operate a Communications Satellite in the Domestic Fixed Satellite Service)))

COMMENTS OF PUBLIC SERVICE SATELLITE CONSORTIUM

Public Service Satellite Consortium (PSSC) hereby submits these Comments in support of the Norris Satellite Communications, Incorporated. As background, PSSC is a nonprofit membership organization. Our members are involved in public service applications of telecommunications technology, and represent the fields of education, health and medicine, public broadcasting, state government, trade, civic and professional associations and religious groups. We act, to a great extent, as a clearinghouse for information on programming sources, innovative technologies, technical considerations, and other telecommunications-related subjects for our members.

Our mission at PSSC is to help people appropriately apply existing and emerging communications technologies. For more than 16 years, PSSC has been the meeting place for people pioneering new and innovative telecommunications technologies. Some of the biggest and most advanced telecommunications users in the nonprofit world are PSSC members, including the American Hospital Association, the U.S. Chamber of Commerce, the American Association of School Administrators, the National Education Association, the American Association of Community and Junior Colleges, the American Library Association and many more. In fulfillment of its mission, PSSC has been instrumental in introducing telecommunications advances in public service organizations as well as numerous educational institutions now involved in distance learning ventures. Many public service organizations with satellite networks can trace their involvement in telecommunications technology to PSSC.

From its inception, PSSC has been providing support services for NASA's communications satellite programs, beginning with the Applications Technology Satellite (ATS) series, through the follow-on Communications Technology Satellite (CTS or Hermes), to the currently planned Advanced Communications Technology Satellite (ACTS).

The ACTS program represents NASA's reentry into communications satellite research and development after a hiatus of several years. The satellite, scheduled for launch in

1992, will offer innovative technologies: fixed and electronically hopping spot beams, onboard switching and signal processing at the circuit level, and operation in the 30/20 GHz frequency range (Ka-Band). It is anticipated that these technologies, once commercially available, would provide low-cost, high capacity communications service directly to the customer's premises. The ACTS Program provides a test bed. The Norris Communications intiative is extremely timely because it is the first commercial proposal to use the Ka-band frequencies.

PSSC currently assists the ACTS Program in developing experimenter interest and participation, internally through the creation and maintenance of a reference library and public information facility, and externally through experimenter recruitment and meeting support. Public Service Satellite Consortium urges the Commission to grant the application of Norris Satellite Communications, Inc. Implementation of this Ka-band satellite system would serve the public interest by promoting the use of a new frequency band, reducing congestion in the C- and Ku-bands, and providing new service options.

The United States at present lags behind Japan and Europe in the implementation of Ka-band satellite communications service. Norris alone has proposed implementation of a commercial Ka-band system. The fact that there was no planned operational follow-on to the ACTS program makes the Norris application technically, politically and programmatically attractive, and commercially viable. Experimenter investments in satellite terminals, programs, and research will be enhanced if a commercial Ka-band satellite service is available after the demonstration period.

PSSC, therefore, petitions the Commission to approve the Norris application, enabling a private venture to bring this new technology and new frequencies on-line. The proposed Norris satellite system can meet the diverse needs of specialized users, both corporate and public service, for operation in an interference-free environment and for transmission of extremely high data rates made possible by the commercial application of Ka-band technology.

The Communications Act of 1934, as amended, calls upon the Federal Communications Commission to "make available, so far as possible, to all the people of the United States a rapid, efficient, nation-wide and world-wide wire and radio communication service." Granting the Norris application would be consistent with the Commission's statutory mandate as this new licensee would bring to the market a state-of-the-technology satellite operating on previously unused frequencies.