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JUN 18 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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COUNSEL

June 18, 1996

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Application of Columbia Communications Corporation For Special Temporary Authority to Operate Capacity on the TDRS-6 Satellite at 47° W.L.

Dear Mr. Caton:

PanAmSat Corporation ("PanAmSat"), by its attorneys, hereby submits these further comments with respect to the above-referenced request of Columbia Communications Corporation ("Columbia") for Special Temporary Authority ("STA") to operate capacity on the NASA TDRS-6 spacecraft located at 47° W.L.. PanAmSat's initial submission regarding Columbia's STA indicated that, in light of the unusual technical configuration of the TDRS-6 satellite, PanAmSat has a number of technical concerns with Columbia's request.¹ PanAmSat also noted that representatives of PanAmSat and Columbia were planning to meet on June 14, 1996, in order to ascertain whether grant of the STA would impact adversely PanAmSat's existing operations via its PAS-1 satellite, located at 45° W.L..²

The June 14, 1996, meeting between the parties was productive, and PanAmSat is committed to continue to work with Columbia in an effort to coordinate the parties' respective operations. It appears, however, that unconditional grant of Columbia's STA request would result in harmful interference to those PanAmSat customers on PAS-1 that make use of frequencies which overlap with those Columbia seeks to use. Specifically, PanAmSat is concerned that analog transmissions via the TDRS-6 satellite

¹ Letter from Daniel S. Goldberg, counsel to PanAmSat, to William F. Caton, Acting Secretary, dated June 7, 1996.

² *Id.* PanAmSat's June 7, 1996, submission to the Commission indicated that PanAmSat and Columbia were meeting on June 14, 1996, at PanAmSat's request. Following that submission, however, the undersigned learned that such meeting took place at Columbia's request.

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will interfere with narrowband digital VSAT transmissions via PAS-1 on certain common frequencies.

PanAmSat understands that Columbia hopes to begin testing of the TDRS-6 satellite in the near term. After carefully reviewing the materials Columbia provided to PanAmSat at the June 14, 1996, meeting, PanAmSat has proposed to Columbia certain test parameters and procedures designed to mitigate the potential for interference to PAS-1 from testing of the TDRS-6 spacecraft. A copy of these parameters and procedures is attached hereto as Exhibit A.

While PanAmSat supports commencement of testing of TDRS-6 — and, indeed, has worked closely with Columbia to ensure that such testing is meaningful and can be achieved without causing interference to other users — PanAmSat urges the Commission to condition grant of Columbia's STA request on compliance with the test procedures set forth in Exhibit A, hereto. PanAmSat also requests that the Commission make plain that, as is always the case with STAs, operations pursuant to an STA authorization are secondary in nature. Accordingly, in the event that Columbia's transmissions on the TDRS-6 satellite cause harmful interference to PAS-1, Columbia must be required to take steps to resolve immediately such interference, including cessation of all operations upon notice from the Commission.

Sincerely,



Daniel S. Goldberg
Attorney for PanAmSat Corporation

Attachment

cc: Mr. James L. Ball
Mr. Thomas S. Tycz
Mr. Alex C. Latker
Ms. Julie A. Garcia
Mr. David S. Keir

EXHIBIT A

PanAmSat

June 18, 1996

VIA FAX: 301-907-2420

Mr. Kenneth Gross
General Counsel and Chief Operating Officer
Columbia Communications Corporation
7200 Wisconsin Avenue, Suite 701
Bethesda, Maryland 20814

Dear Ken:

This letter serves as a follow-up to conversations you've had with Mr. Dick Granger regarding the preliminary testing of the TDRS-6 Satellite at 47° W.L. I understand from Dick that you would like to test individual transponders by activating a saturated analog carrier from a Washington uplink at or near the center frequency of each transponder. The primary purpose of your test is to verify the operational status of the satellite.

PanAmSat is fully committed to working with you in conducting such tests. Based on the short notice, we were only able to map your proposed analog frequencies to the PAS-1 transponders and conduct a very limited analysis of potential interference to our operating carriers. Based on this preliminary analysis, we are concerned that the saturated analog carriers may cause interference into VSAT SCPC networks operating at or near five of your twelve proposed frequencies. These frequencies are as follows:

3723 MHz, 3760 MHz, 3960 MHz, 4000 MHz, 4075 MHz

Within plus or minus 6 MHz of each of these frequencies we are operating low level SCPC carriers in the northern portions of South America into 2.4 meter and 1.8 meter earth stations. Accordingly, a real potential for interference to these operational carriers exists with the transmission of saturated analog carriers. As an alternative to full power testing of these transponders, we would suggest a small modulated carrier with a 10 dB output backoff. We would be happy to supply suggested carrier frequencies.

With respect to the other frequencies, we believe that your test should not affect our existing operations. I would, however, like to monitor through our facility in Atlanta your activation of these carriers. As you know we operate an extensive remote monitoring system and have visibility of our transponders in South America. Accordingly, if we are aware of the activation of specific signals, we will be able to correlate any interference in a real time mode.

To this end, I would request that your operational personnel make contact with the following individual in Atlanta:

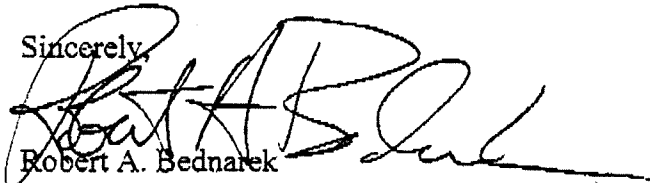
Mr. Bill Prendergast - Manager, ETOC (Tel: 404-244-2300)

A verbal procedure can be established between the two teleports so that the PAS-ETOC can observe the TDRSS carrier activations. In the event that we detect interference as a result of one of the transmissions on the seven frequencies, we will be in a better position to notify your operators to cease the test pending further analysis.

I appreciate your invitation to support your operational tests and assure you that the technical personnel in Atlanta will help in any way possible. We obviously will need to meet to achieve a more specific coordination following your verification of the satellite's operational health.

If you have any questions, please feel free to call.

Sincerely,



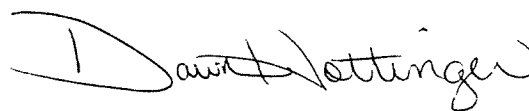
Robert A. Bednarek
Senior Vice President
Engineering and Operations

cc: Fred Landman
Phil Rubin
Dick Granger
Don Bachelder
Bill Prendergast
Dan Goldberg

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing letter was sent by first-class mail, postage prepaid, this 18th day of June, 1996, to each of the following:

David S. Keir
Leventhal, Senter & Lerman
Suite 600
2000 K Street, N.W.
Washington, D.C. 20006-1809

A handwritten signature in cursive script that reads "Dawn Hottinger". The signature is written in black ink and is positioned above a horizontal line.

/s/ Dawn Hottinger
Dawn Hottinger