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Federal Communications Commission
Office of Secretary

August 4, 2006

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: RaySat, Inc. Application for Authority to Operate 4,000 In-Motion Mobile Satellite Antennas in the 14.0-14.5 GHz and 11.7-12.2 GHz Frequency Bands, File No. E060101 SES-LIC-20060629-01083

Dear Ms. Dortch:

On behalf of Parsons Transportation Group Inc. ("Parsons"), I write to express support of the above-captioned application, in which RaySat, Inc. ("RaySat") seeks authority to operate a "Ku-band mobile satellite network consisting of up to 4,000 in-motion remote antennas to be mounted on vehicles operating throughout the continental United States."¹ For the reasons described below, this service will serve the public interest, and RaySat's application should be granted as quickly as possible.

Parsons provides engineering and design, program management, network construction, and operational support for various public transportation projects. With offices worldwide, Parsons employs engineers, designers, scientists, technicians, and other specialists. As a vendor serving transportation providers, Parsons is working to create end-to-end telecommunications and information service solutions for public transportation commuters. The unique design and performance capabilities associated with RaySat's technology will enable Parsons to provide high-bandwidth technology services and digital content to the traveling public despite the demanding physical requirements of the transportation industry. RaySat's low-profile technology can be mounted on vehicles without exceeding overhead safety requirements or clearance limits imposed by tunnel systems.

A grant of RaySat's application will serve the public interest. Specifically, the technology contemplated by the application will (1) further national policy goals regarding public safety by facilitating mobile use of high-speed satellite communications technologies by first-responders and other emergency personnel; (2) advance national policy goals regarding public access to broadband communications by facilitating the use of high-speed communications services on public transportation; and (3) promote national policy goals regarding energy conservation by increasing the attractiveness of mass transit.

First and foremost, as RaySat explains, its proposed offering will provide tremendous benefits to the public safety community. The Communications Act directs the Commission to "make available . . . to all the people of the United States . . . a rapid, efficient, Nationwide . . .

¹ Application at 1.

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communication service . . . for the purpose of promoting safety of life and property.”² The Commission, in turn, has indicated that “[p]ublic safety is one of [its] most important concerns and responsibilities.”³ The Chairman and sitting Commissioners have all agreed.⁴ RaySat’s offering would indisputably further this goal. RaySat predicts that “the greatest operational need” will come from “emergency first responders such as FEMA and state and local government agencies,” which are currently limited to “fixed” or “pop-up” solutions.⁵ Its offering will permit these entities to maintain broadband connectivity while traveling from location to location, independent of any localized power source or landline communications link. This capability, of course, is likely to be critical in the case of natural and man-made disasters and other public emergencies.

Second, RaySat’s offering will further national goals favoring broadband deployment. Here, too, the Act is clear: Section 706 of the Telecommunications Act of 1996 directs the Commission to “encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans” by using regulatory measures that “remove barriers to infrastructure investment.”⁶ President Bush, moreover, has called for universal, affordable access to broadband by the year 2007.⁷ Consistent with goals of the Act and the Administration, Chairman Martin’s Five-Year Strategic Plan for the Commission makes broadband deployment a central FCC priority: “All Americans should have affordable access to robust and reliable broadband products and services. Regulatory policies must promote technological neutrality, competition, investment, and innovation to ensure that broadband service providers have sufficient incentive to develop and offer such products and services.”⁸ Several other sitting Commissioners have concurred with the central importance of Congress’s deployment goals.⁹ RaySat’s proposal

² 47 U.S.C. § 151.

³ *Amendment of Part 76 of the Commission’s Rules to Extend Interference Protection to the Marine and Aeronautical Distress and Safety Frequency 406.025 MHz*, 19 FCC Rcd 7244, 7246, para. 9 (2004).

⁴ See Remarks by Commissioner Kevin J. Martin to the Santa Fe Conference of the Center for Public Utilities Advisory Council, Santa Fe, New Mexico (March 18, 2003) (“[O]ne of our most important missions is to ensure that public safety can respond quickly to citizens in every-day, as well as national, emergencies.”); *Communications Assistance for Law Enforcement Act and Broadband Access and Services*, Second Report and Order and Memorandum Opinion and Order, ET Docket No. 04-295; RM-10865, Statement of Michael J. Copps (rel. May 12, 2006) (“As I have often said, the first obligation of a public servant is the safety of the people.”); *id.* Statement of Commissioner Jonathan S. Adelstein (“There is no higher calling for us at the Commission than preserving public safety....”); *id.* Statement of Commissioner Deborah Taylor Tate (“Our number one priority at this point in our nation’s history must be ... the safety of every American.”).

⁵ Application at 4.

⁶ 47 U.S.C. § 157 nt.

⁷ See, e.g., *A New Generation of American Innovation* (April 2004), available at http://www.whitehouse.gov/infocus/technology/economic_policy200404/innovation.pdf.

⁸ FCC Strategic Plan 2006-2011. The Plan lists key “objectives,” among which is the “[c]onceptualiz[ation of] broadband in a way that includes any platform capable of providing high-bandwidth intensive content.” *Id.*

⁹ See, e.g., Remarks of Commissioner Michael J. Copps, Freedom to Connect 2006 (April 3, 2006) (“Broadband is going to be one of truly major drivers of our economy in this new century.”); Remarks of Commissioner Jonathan Adelstein, Center for the New West – Universal Service Policy (April 22, 2005) (“The need for ubiquitous broadband pipes is becoming essential because we are experiencing a revolution in the applications that will ride over this infrastructure.... The ability to deliver voice, data, video, and real-time communications services over a converged, packetized network will mean increased educational, economic, health, and social opportunities for businesses and consumers alike.”); Commissioner Deborah Taylor Tate, Keynote Speech to OPASTCO (April 13, 2006) (“[T]he most important issue for VOIP -- and

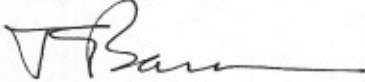
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would, of course, expand access to high-speed services, permitting use of broadband-enabled educational, professional, or entertainment applications "on the go," furthering the goals of Congress, the President, and the Commission alike.

Third, because it will be used extensively in mass-transit settings, and will thus increase the attractiveness of public transportation, RaySat's service will also advance national policies regarding energy conservation. In the wake of rising oil prices, the President has asked Americans to drive less and to otherwise husband energy resources.¹⁰ RaySat's offering would enable passengers of public transportation to use broadband services while commuting. This, in turn, will encourage greater reliance on mass transit, promoting national conservation goals.

For the reasons described above, Parsons urges the Commission to grant RaySat's application.

Very truly yours,



Thomas E. Barron
Executive Vice President

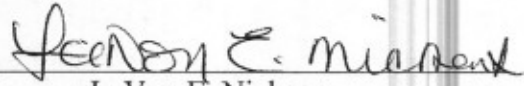
for many other industries -- is the deployment of broadband. Building out high-speed Internet access is the 21st century equivalent of building the Interstate highway system. Broadband is all about how people get connected to each other, and the more people it reaches, the more valuable it is.").

¹⁰ See, e.g., David Leonhardt, Jad Mouawad and David E. Sanger, *To Conserve Gas, President Calls for Less Driving*, New York Times (Sept. 27, 2005) ("With fears mounting that high energy costs will crimp economic growth, President Bush called on Americans yesterday to conserve gasoline by driving less."); Warren Vieth and Richard Simon, *Bush Urges Conservation to Ease Nation's Fuel Shortage*, Baltimore Sun (Sept. 27, 2005).

CERTIFICATE OF SERVICE

I, LaVon E. Nickens, hereby certify that on this 4th day of August, 2006, the foregoing letter in support of RaySat, Inc.'s Application for Authorization to Operate up to 4,000 Vehicle-Mounted Satellite Antennas, File No. SES-LIC-20060629-01083, was served via first class U.S. mail to the following:

RaySat, Inc.
8460-D Tyco Road
Vienna, VA 22182
Washington, D.C. 20036


LaVon E. Nickens