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BY HAND DELIVERY

Ms. Magalie R. Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Supplemental Information Regarding Application of Lockheed
Martin Corporation to Modify Earth Station at Carpentersville, NJ
(File No. SES-MOD-20001130-02268, Call Sign E7541)**

Dear Ms. Salas:

This letter provides supplemental information regarding the above-referenced application of Lockheed Martin Corporation ("LMC") to modify its license for a C-band Earth station facility at Carpentersville, New Jersey to include spectrum in the 3650-3700 MHz (extended C-band) range. In its application, LMC sought a waiver of the new Commission rule that would accord primary status only to those extended C-band applications that were filed prior to December 1, 2000 and which sought to establish new or modified extended C-band facilities that are located within 10 miles of an existing grandfathered extended C-band Earth station receive site. LMC's application was filed on November 30, 2000, but requested primary status for an extended C-band Earth station receive site that is located approximately 45 miles from the nearest grandfathered site (i.e., the one in Franklin, New Jersey). See LMC Application at Exhibit 1.

By the enclosed figure, which was prepared for LMC by Comsearch, LMC now shows that if a 200 kilometer coordination zone for fixed service systems, as is proposed in the Commission's *First Report and Order and Second Notice of Proposed Rule Making* in ET Docket No. 98-237,¹ is established around the coordinates of LMC's Carpentersville Earth station facility in western New Jersey, the entire 200 kilometer coordination zone would be encompassed within the 200 kilometer coordination zones of other extended C-band Earth

¹ *Amendment of the Commission's Rules with Regard to the 3650-3700 MHz Government Transfer Band*, FCC 00-363, slip op. at 43 (¶ 104) (released October 24, 2000) ("Order/NPRM").

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stations on the grandfathered list that is attached to the *Order/NPRM*. In other words, any fixed service applicant anywhere within 200 kilometers of the Carpentersville facility would, upon adoption of the rules proposed by the Commission, already be under an obligation to coordinate with one or more extended C-band Earth stations. As a result, the grant of primary status to LMC's proposed facility would not impose any coordination obligation that does not already exist, yet it would provide the certainty and other desirable benefits of primary status that LMC recited in its application. *See* LMC Application at Exhibit 1.

Furthermore, LMC takes this opportunity to remind the Commission that in its Application, LMC showed, through aerial photographs and otherwise, that the two existing antennas that would be used to receive extended C-band transmissions at Carpentersville are located deep within a working stone quarry, and are thus shielded by terrain from terrestrial interference. LMC indicated that the only practical way a terrestrial transmitter could interfere with the Earth station's use of the 3650-3700 MHz band would be if the transmitter were installed on the rim of the quarry and pointed straight down into the Earth station antennas. As a further inhibition to the already scant likelihood that a terrestrial station could ever interfere, absent specific intent to do so, with the use of extended C-band frequencies by LMC's Earth station facility, LMC reported that the site is located in the middle of a migratory bird flight path and at the edge of the Pohatcong Grasslands Project – both of which are vigorously defended by local advocacy groups that have for many years fended off attempts at wireless tower sitings and other forms of development. There are currently no wireless towers in any service located within the line of sight of the proposed extended C-band antenna. *See* LMC Application at Exhibit 1 and attachments. These additional factors provided in support of the requested waiver of footnote NG169 from the *Order/NPRM* further reduce the already *de minimis* coordination burden that would be imposed upon fixed service systems by the grant to LMC of primary status for the extended C-band spectrum at its Carpentersville Earth station facility, and would not in any way trigger the Commission's fears of "unrestrained deployment of FSS earth stations [that] could hinder or greatly inhibit the opportunities for terrestrial operations in the band."²

In short, LMC shows that a 200 kilometer coordination zone around the Carpentersville facility would be fully subsumed within the coordination zones of grandfathered extended C-band Earth station complexes, which means that no additional coordination obligation would be assumed by fixed service stations upon the grant to LMC of primary status for this facility. To bolster this case, LMC has previously shown that the unique terrain features of the Carpentersville complex will greatly reduce the likelihood that a terrestrial station could interfere

²

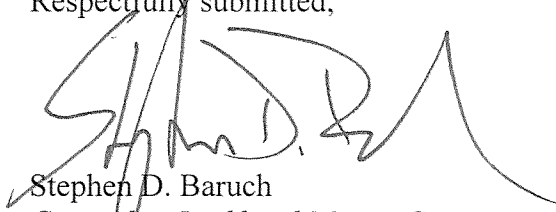
See Order/NPRM, FCC 00-363, slip op. at ¶ 18.

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with the Earth station's operations in any event. Under these circumstances, LMC respectfully urges the Commission to proceed expeditiously to grant LMC's extended C-band modification of license application for Carpentersville, as amended.

Respectfully submitted,



Stephen D. Baruch
Counsel to Lockheed Martin Corporation

Enclosure

cc (w/ encl.): Karl Kensinger (by e-mail)
Sylvia Lam (by e-mail)



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