

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the matter of )  
 )  
Mitigation of Orbit Debris ) IB Docket No. 02-54  
 )  
Initial Regulatory Flexibility Analysis )  
 )  
To: The Commission )

**COMMENTS OF THE RADIO AMATEUR SATELLITE CORPORATION  
REGARDING INITIAL REGULATORY FLEXIBILITY ANALYSIS**

1. The Radio Amateur Satellite Corporation (hereinafter referred to as “AMSAT<sup>®</sup>”), pursuant to Section 1.405 of the Commission’s Rules and Regulations, respectfully submits these comments in response to the Commission’s Notice of Proposed Rule Making, IB Docket No. 02-54, released March 18, 2002. These Comments pertain to the Initial Regulatory Flexibility Analysis (IRFA).
  
2. AMSAT was founded in 1969 and chartered in the District of Columbia. It is recognized by the Internal Revenue Service as a 501(c)(3) scientific and educational organization. In its over 33 years of existence, AMSAT has been involved in the construction, testing, launch and operation of ten amateur radio satellites, the latest being Phase 3D, now renamed AMSAT-OSCAR-40 (AO-40).
  
3. AMSAT wishes to address the IRFA considerations noted by the Commission in this proceeding.<sup>1</sup> AMSAT feels that it *does* qualify as a “small entity” and will be filing as such as directed in the NPRM. In addition, a number of universities and colleges across the country have built and launched amateur radio satellites, and many others have expressed interest in doing so in

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<sup>1</sup> NPRM at §66 and Appendix C

the future. Many of these can certainly be classified as “small entities” when it comes to their position in the space industry. Additionally, thousands of individual licensed amateurs, while not businesses, are certainly “small entities”. AMSAT contends that all of these must be considered in the Commission’s formulation of any new rules which may be imposed on the amateur-satellite service.

RESPECTFULLY SUBMITTED,

The Radio Amateur Satellite Corporation  
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By \_\_\_\_\_ Date July 17, 2002  
Dr. Perry I. Klein, W3PK  
Vice President, Government Liaison