

**CONCURRING STATEMENT OF  
COMMISSIONER MICHAEL J. COPPS**

*Re: COMSAT CORPORATION; Request for Reduction of Regulatory Fees For Fiscal Years 2001, 2000, and 1998; Fee Control Nos. 0109268835483010 et al.*

I concur in today's decision because I believe it is a very close call whether the Office of the Managing Director's 2003 decision warrants reconsideration. Nevertheless, I recognize there is room for at least some additional factual analysis in order to address fully the D.C. Circuit's concern that our 1998, 2000, and 2001 COMSAT regulatory fees may not have been "well apportioned." I want to emphasize my belief that our ultimate resolution of this issue need not depart from the idea of a per-satellite regulatory fee for recovery of section 9 costs.