



October 7, 2019

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Expanding Flexible Use of the 3.7-4.2 GHz Band, GN Docket No. 18-122, Ex Parte Notice

Dear Ms. Dortch:

Pursuant to Section 1.1200, et seq., of the Commission's Rules, National Public Radio, Inc. ("NPR") hereby notifies the Commission of the following *ex parte* presentations in the above-referenced proceeding. On October 3, 2019, Michael Beach, Vice President for Distribution, Joni Lupovitz, Senior Director for Public Policy, and the undersigned had separate meetings with the following Commission personnel: Will Adams, Legal Advisor to Commissioner Carr; William Davenport, Chief of Staff & Senior Legal Advisor for Wireless and International for Commissioner Starks; Umair Javed, Legal Advisor, Wireless and International for Commissioner Rosenworcel; and Erin McGrath, Legal Advisor, Wireless, Public Safety and International for Commissioner O'Rielly. Also on Thursday, October 3, 2019, the foregoing NPR participants joined by Phil Anderson, of Navigators Global, met with Aaron Goldberger, Wireless and International Advisor for Chairman Pai. NPR requested these meetings in its capacity as manager of the Public Radio Satellite System ("PRSS") and on behalf of all of public radio.

The discussions focused on the attached presentation, which summarizes the public radio system's dependence on C-band satellite spectrum to distribute local and national public radio programming, emergency alerting and public safety information by and among public radio producers and 1,265 local public radio stations, collectively broadcasting to 41 million American listeners weekly. NPR explained that C-band satellite service is essential for public radio because of its availability across the country, including Alaska, tribal areas, and other rural and extremely remote areas; its reliability for live radio programming; and its affordability for reaching hundreds of local communities across the continent and beyond. NPR noted the longstanding and substantial congressional investment in the PRSS, including ongoing current support for a system upgrade. NPR further discussed the practical implications of proposals to reallocate C-band spectrum, and basic requirements to meet public radio needs for available, reliable and affordable means of program distribution going forward. NPR urged the Commission to ensure reimbursement of transition costs as well as any resulting increase in operating costs so that incumbent users are "made whole" in any reallocation of C-band spectrum. NPR referenced its [August 28, 2019 *ex parte* filing](#) in the above-referenced proceeding, which highlights FCC precedent over three decades for requiring reimbursement of relocated spectrum incumbents for increased operating costs.

Please direct any questions you may have to the undersigned at 202.513.2050.

Sincerely,

Gregory A. Lewis /s/

Gregory A. Lewis
Deputy General Counsel

cc: Will Adams
William Davenport
Aaron Goldberger
Umair Javed
Erin McGrath



Expanding Flexible Use of the 3.7-4.2 GHz C-Band

GN Docket No. 18-122

October 3, 2019

The Nationwide Public Radio Satellite System (PRSS)

PRSS connects local public radio stations + programmers + American people

- Reaches all 50 States, including rural and extremely remote areas, Alaska & Hawaii
- Connects D.C., Puerto Rico and U.S. Virgin Islands



450,000+

hours of news, music,
and other programming
distributed annually



1,265

public radio stations
connected



100+

program producers &
distributors



98.5%

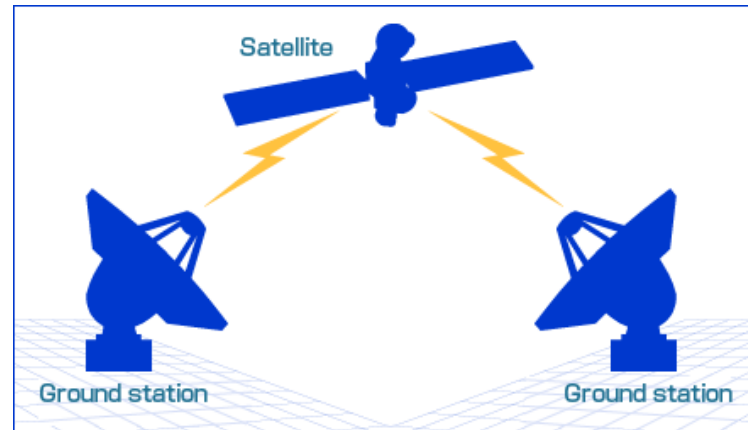
of the U.S. population
reached



- **41 million American on-air listeners weekly**
- 80% of programming is broadcast **live**
- Local/regional journalism collaborations
e.g., Harvest Public Media, Ohio Valley ReSource

In-State Public Radio Networks Also Rely on C-Band Spectrum

- **Via PRSS:** West Virginia Public Broadcasting and others send local in-state programming via the PRSS Network Operations Center, bypassing need for and cost of operating a local satellite uplink.
- **Via PRSS bandwidth:** Colorado, Minnesota, New Hampshire, and others use PRSS's satellite space to distribute in-state public radio programming via C-Band using their own uplinks.
- **Via other C-band service:** Alaska uses C-Band satellite bandwidth for in-state public radio program distribution separate from PRSS.



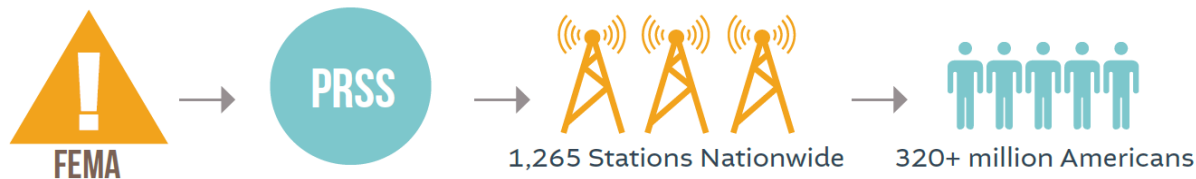
Satellite is Vital for Public Safety & Emergency Alerts

Public radio's satellite infrastructure provides resilient communications before, during & after disasters

- even when power grids, Internet & other communications systems are down
- even in rural and remote areas

❖ **Nationwide emergency alerting**

PRSS receives the Presidential-level Emergency Alert System feed directly from FEMA



❖ **Regional emergency networks operate through NPR satellite bandwidth**

Examples: Minnesota, Louisiana, West Virginia

❖ **Temporary regional networks operate during disasters**

Example: Florida Public Radio Emergency Network (FPREN)

Longstanding Congressional Support for PRSS & Next Gen System

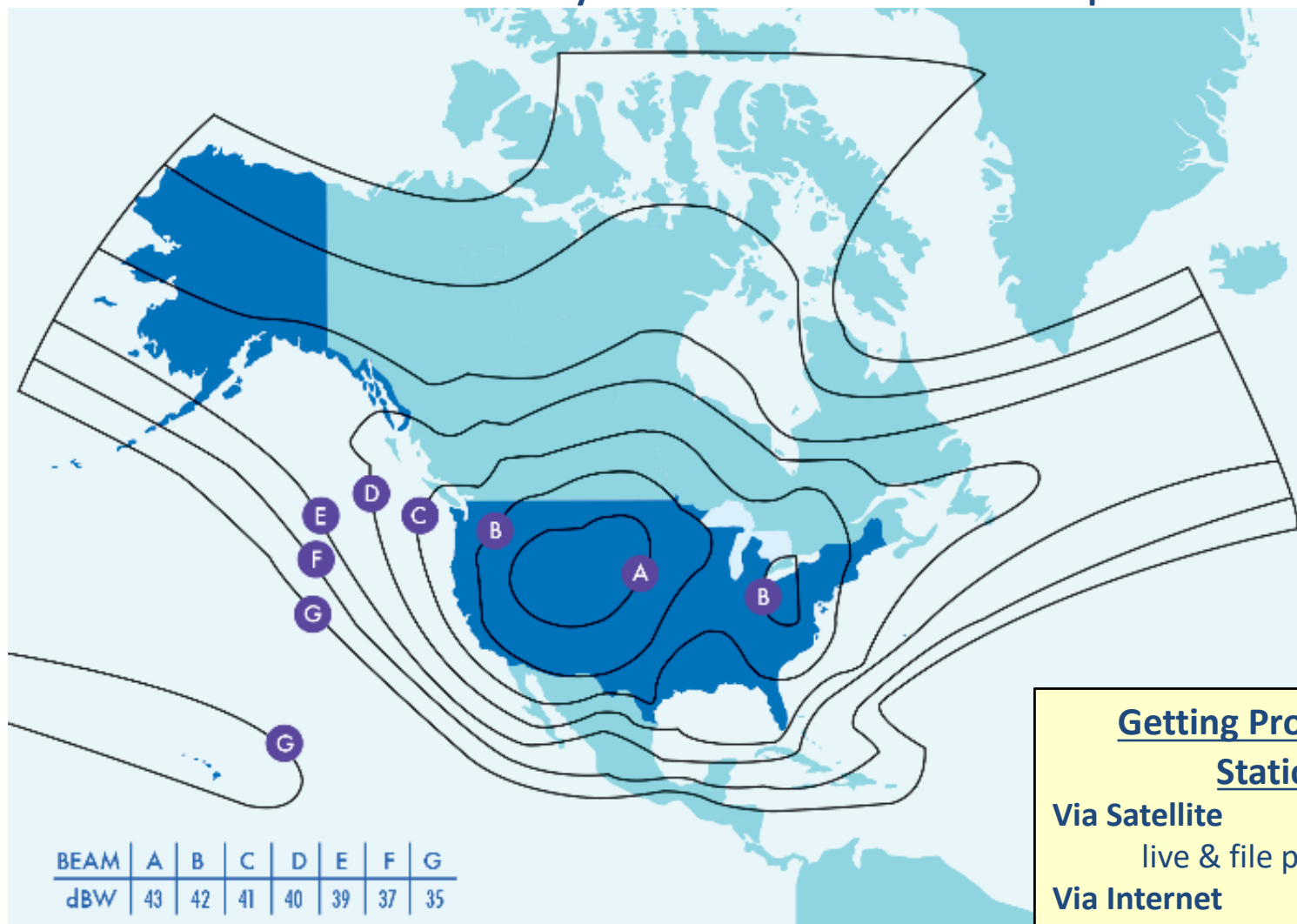
- Congress has provided federal funding for PRSS since the 1970s
- Current congressional funding for \$53.5 million upgrade
 - 10-year-long project; funded in one-year increments since FY 2018
 - Supports complete refresh of current system, including:
 - Improved satellite transponder efficiency
 - Software and equipment at local stations
 - Improvements at the network level (Network Operations Center & Backup NOC)
 - Satellite lease and insurance
- Independent review shows PRSS is utilizing the most cost-effective, secure, and reliable technologies on the market.
 - In June 2016, the Corporation for Public Broadcasting engaged an independent consultant to review the proposed replacement plan for PRSS.
 - The consultant found: “No other alternative discussed or examined – including commercially available options – is more cost effective or likely to result in success.”

Why C-Band Satellite Service Is Essential For Public Radio

- **Availability:** Satellite is unparalleled in reaching even the most rural and remote regions of the United States.
 - Satellite covers areas where fiber is unavailable or unaffordable
- **Reliability:** Satellite delivery is the most secure, reliable technology currently available to serve the national public radio infrastructure.
 - C-band has unique propagation characteristics, less susceptible to “rain fade” in poor weather conditions than Ku- and Ka-band options
 - Full-band, full-arc licensing provides needed flexibility for live radio to change transponders/satellites in case of satellite disruptions
- **Affordability:** Satellite is the most cost effective means of reaching hundreds of local communities across the country.

C-Band Satellite Delivery Provides Optimal Coverage

Reach of the PRSS: Intelsat Galaxy 16 Satellite Transmission Footprint



Getting Programs to Stations

Via Satellite

live & file programs

Via Internet

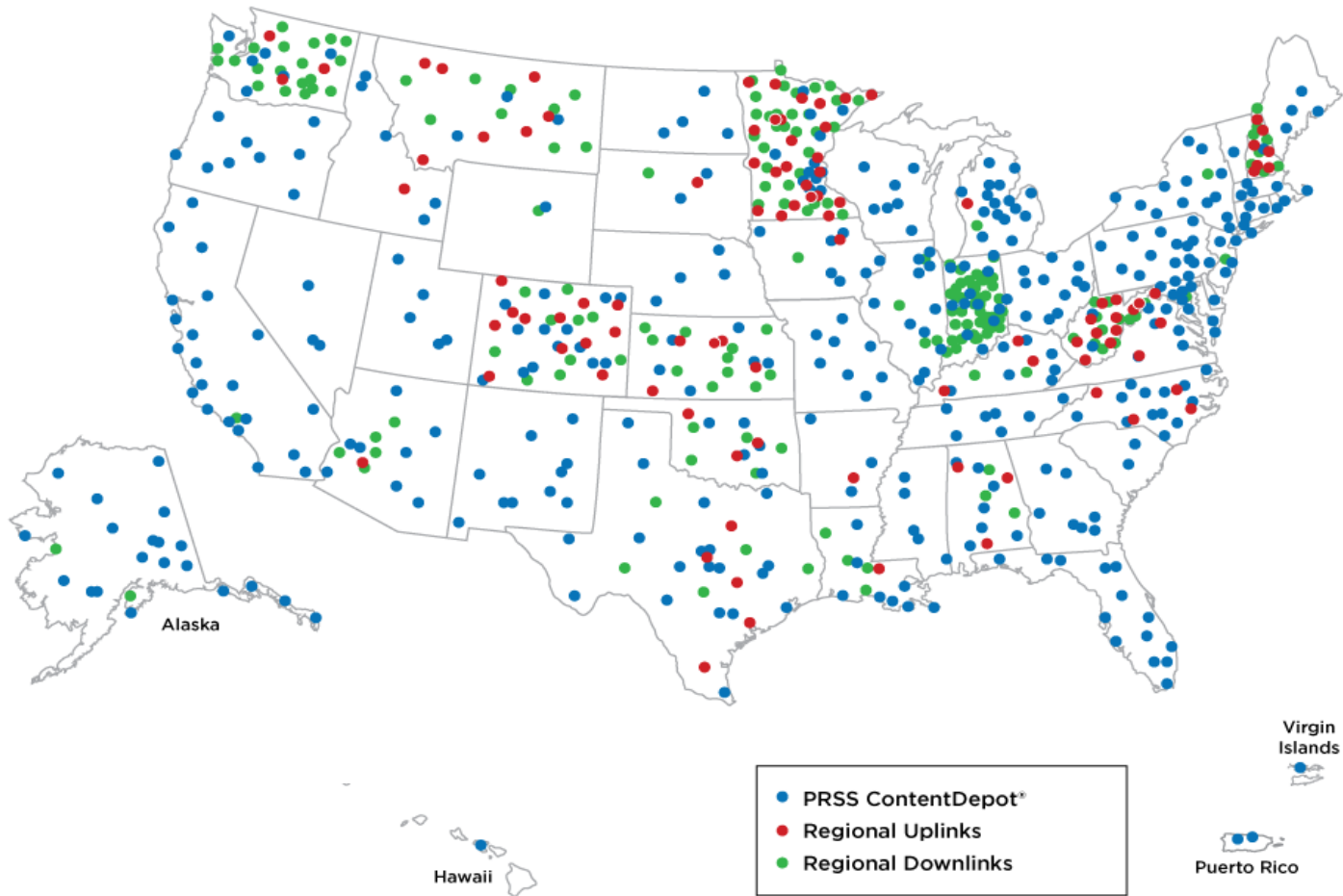
file programs only

n p r

464 Total Public Radio Earth Stations in Markets of all Sizes

- PRSS downlinks in all 50 states + D.C., Puerto Rico, U.S. Virgin Islands

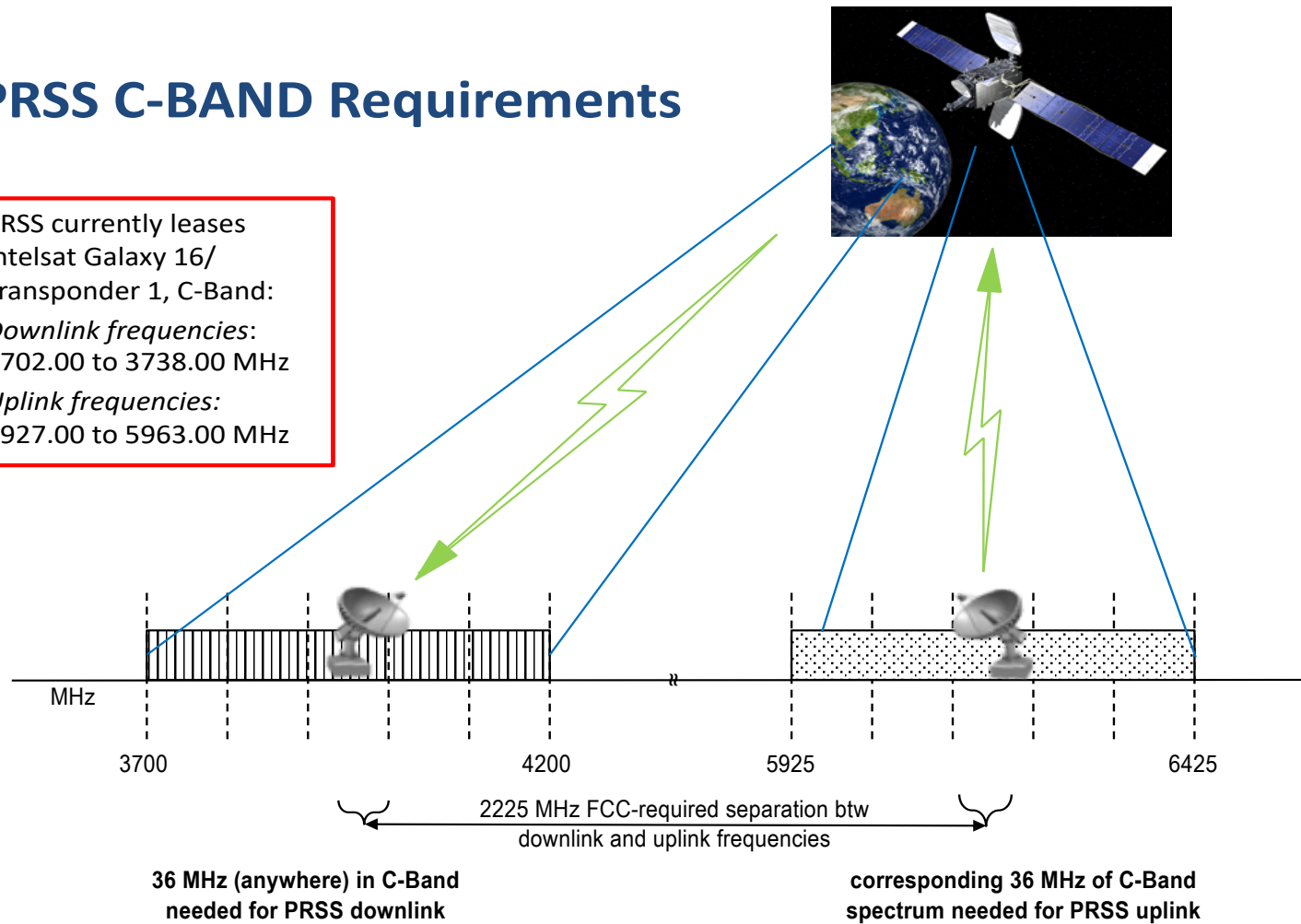
Public Radio C-Band Downlinks



PRSS Uses One Satellite Transponder – 36 MHz of C-Band Spectrum

PRSS C-BAND Requirements

PRSS currently leases
Intelsat Galaxy 16/
Transponder 1, C-Band:
Downlink frequencies:
3702.00 to 3738.00 MHz
Uplink frequencies:
5927.00 to 5963.00 MHz



What Public Radio Needs to “Remain Whole” During Any Spectrum Reallocation:

- **Availability** – across the United States continent and beyond
 - Coverage in Alaska, tribal lands, and other remote areas without fiber
 - Capacity for business growth
- **Reliability** – for delivering **live** radio programming
 - No harmful signal interference
 - Redundancy/back-up for program continuity in case of system disruption
 - e.g., full-band, full-arc satellite
- **Affordability** – critical for nonprofit, low-resource public radio stations
 - Cover all transition costs incurred
 - Cover any increases in operating /service costs going forward*
 - *note FCC precedent over three decades for requiring reimbursement of relocated spectrum incumbents for increased operating costs

Practical Implications of C-Band Frequency Transition for Public Radio

Changing transponders on same satellite – some work:

- If new transponder has same polarity:
 - some earth stations can be transitioned with remote key strokes
 - some earth stations require on-site transition
 - takes about 18-months to transition entire PRSS network
- If new transponder has different polarity:
 - *Every* earth station requires on-site, manual transition
- Many stations don't have in-house capability to reprogram/repoint downlinks & need to hire a contractor to transition

Moving to a new satellite is more difficult:

- Need to repoint *all* downlink antennas
- May need to move and/or replace satellite dishes
- Satellite footprint may not be sufficient
- Satellite may not have proper polarization type

Transitioning to a hybrid satellite/fiber system is most difficult & most expensive:

- Requires new equipment for fiber, availability of redundant system
- Added cost of paying for new fiber connections on top of satellite delivery

How the Stakeholder C-band Proposals Meet Public Radio Needs

	CBA (clear 200 MHz)	AT&T (CBA modified)	ACA-CCA-Charter (clear 370 MHz)	T-Mobile (clear 500 MHz)	WISPA/BAC (share FSS MHz)
Availability	300 MHz for incumbents	300 MHz for incumbents	130 MHz for non-video incumbents	0 MHz for incumbents	
Alaska, remote areas	If C-band service	If C-band service	If C-band service	X	
Capacity for biz growth	X	X	X	X	X
Reliability					
Interference risk mitigated	Guard band, filters, OOB emission masks	No guard band; Unrestricted power levels could raise overall RF noise floor; alternative OOB emissions limit			No proven, real-world interference protection
Full-band, full-arc	yes	?	Smaller more congested band	X	X
Affordability					
Transition costs	Transition costs	Transition costs	Repacking cost assumes TPEs interchangeable	Cost to replace earth stations w/ fiber links	N/A
Operational costs	? *need to ensure satellite availability w/ current contract pricing	? *need to ensure satellite availability w/current contract pricing	Likely increased cost of satellite service Covers only 2 years lost revenue for satellite providers	X Increased cost of fiber service	