



January 14, 2019

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

**Re: Ex Parte Letter - Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band
(GN Docket No. 18-122)**

Dear Ms. Dortch:

Global Eagle Entertainment, Inc. ("Global Eagle") urges the Federal Communications Commission ("Commission") to dismiss recommendations made by T-Mobile USA, Inc. ("T-Mobile") and the Competitive Carriers Association ("CCA") to repurpose 300 MHz or more of 3.7-4.2 GHz band ("C-band") spectrum for flexible use.¹ These flawed proposals show complete disregard for the amount of spectrum needed to protect incumbent Fixed Satellite Service ("FSS") operations in the band, which support, among other services, distribution of broadband services in rural areas of the country as well as to off-shore platform and maritime users not served by terrestrial networks.

The proposal advanced by the C-Band Alliance to repurpose up to 200 MHz of C-Band spectrum, including a guard band, would preserve sufficient spectrum to support existing FSS operations. Neither the T-Mobile nor CCA proposals would leave nearly enough spectrum to support these critical services. T-Mobile suggests that the FCC auction all 500 MHz of the C-band for terrestrial mobile broadband, and at least 300 MHz in most markets. CCA advises clearing a minimum 320 MHz, including a 20 MHz guard band. Such proposals are self-serving, inequitable and contrary to the public interest in maintaining existing C-band FSS service for the many customers and end users that rely upon it to meet critical needs.

¹ See Notice of Ex Parte, T-Mobile USA, Inc., GN Docket No. 18-122 (filed Dec. 13, 2018); Notice of Ex Parte, Competitive Carriers Association, GN Docket No. 18-122 (filed Dec. 20, 2018).

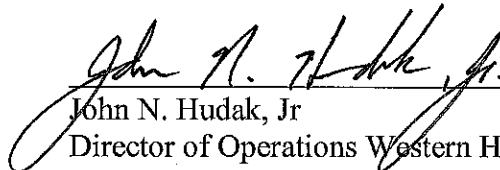
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Global Eagle depends upon the broad coverage and cost-effectiveness of C-band satellite distribution to provide crucial connectivity services to its government, maritime, oil and gas and other customers requiring robust, all-weather two-way connectivity at remote locations. These services, when taken in combination with the multitude of audio and video programming carried on C-band satellites, require much more C-Band spectrum dedicated to satellite services than the T-Mobile and CCA proposals would allow.

Moreover, there is no suitable alternative to C-band. Ku- and Ka-band spectrum lack the capacity and operational performance characteristics to meet our quality and reliability requirements, and fiber networks have limited reach and are cost prohibitive. The FCC must preserve sufficient C-band spectrum – at least 300 MHz – to ensure continuation of incumbent FSS operations.

Because both the T-Mobile and CCA proposals would result in incumbent providers losing access to the cost-effective, high-quality distribution C-band satellite service upon which they rely, the proposals are simply not viable. Global Eagle urges the Commission to protect FSS use in the C-band and dismiss these proposals that threaten rural, off-shore and maritime consumers' access to the broadband services they enjoy today.

Respectfully submitted,


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