January 24, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: RM-11778

Dear Ms. Dortch:

The Content Companies signing below respectfully submit this letter in opposition to the Petition for Rulemaking ("Petition") filed by Fixed Wireless Communications Coalition, Inc. ("FWCC") in the above-captioned proceeding.[1] The Content Companies are deeply concerned that the rule changes proposed by the FWCC would have a harmful impact on C Band satellite spectrum, which the companies all use to ensure reliable distribution of content to more than 100 million American television households each day. In particular, the Content Companies rely upon C Band satellite spectrum to ensure that content reaches all of the head-ends of multichannel video programming distributors (MVPDs) and all of the broadcast stations affiliated with our broadcast networks. Increasingly, the Content Companies rely upon this same spectrum to distribute content to innovative over-the-top distributors as well, including Sling and DirecTV Now. And we also depend upon this spectrum to telecast live programming from the field, whether breaking news or popular sports events. It is the C Band spectrum that enables our companies to backhaul this live programming from remote sites to our operations centers before the content is distributed to consumers. All of this happens today with near-perfect reliability, some of which is coordinated with very short notice, thanks to C Band.

In order to ensure that critical news and informational programming and groundbreaking sports and entertainment content reaches MVPDs, broadcast stations and OTT distributors without interruption, even in the event of a failure such as a satellite anomaly, the Content Companies need to have the ability to quickly utilize different frequencies and/or satellites. Elimination of the Commission's long-standing and highly successful full-band, full-arc earth station licensing policy, as suggested by the FWCC Petition, would result in substantial harm to the C Band spectrum and thus to the American consumers that we serve. Because the very nature of video distribution requires that Content Companies have the flexibility to move to alternative satellite capacity and to coordinate their operational parameters – at times on short notice – the rigid licensing regime proposed by the FWCC Petition necessarily would have a negative impact on our operations and, ultimately, consumers' ability to reliably enjoy world-class video programming. The impact would affect consumers regardless of whether they subscribe to an MVPD or an OTT distributor, or whether they enjoy broadcast content over-the-air.

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[1] Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service, RM-11778 (filed Oct. 11, 2016).

Accordingly, the Content Companies respectfully request that the Commission deny or dismiss FWCC's Petition.

Respectfully submitted,

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