NATIONAL SPECTRUM MANAGEMENT ASSOCIATION

January 24, 2017

VIA ELECTRONIC FILING

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

Re: RM-11778*, Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed-Satellite Service*

Dear Ms. Dortch:

The National Spectrum Management Association (NSMA)[1] submits these Reply Comments in support of the petition filed by the Fixed Wireless Communications Coalition (FWCC) to improve parity in frequency coordination in the bands shared between the Fixed Service and the Fixed-Satellite Service.

The current FWCC petition is primarily related to changing the way the fixed service earth stations are licensed. As an organization whose middle name is "Spectrum Management," we have an interest in the spectrum conservation impact of the petition. Our organization promotes efficient sharing of spectrum allocated to all services

SPECTRUM WAREHOUSING

Currently the federal government allows fixed-satellite service earth stations to license all frequencies and all geostationary arc pointing directions (so called "full band full arc" licensing) regardless of utilization. In many cases, this type of licensing is clearly warranted. During the Comments phase of this proceeding, the Satellite Industry Association, EchoStar Satellite Operating Corporation, Hughes Network Systems, Intelsat and SES Americom described their needs and we believe their needs should be accommodated. As one of our broadcaster members mentioned during internal discussions, full band full arc protection for some TVRO stations is necessary to allow the operator to tune to different satellites to receive programming and news events. Teleport facilities typically need full band full arc capability. We support these requirements when justified.

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[1] NSMA is a voluntary association of individuals involved in the spectrum management profession including service providers, manufacturers, frequency coordinators, engineers and consultants. NSMA's goal is to promote rational spectrum policy through consensus views formulated by representatives of diverse segments of the wireless industry.

Our primary interest in this proceeding is spectrum conservation. If frequencies, polarizations or azimuths are licensed (and therefore accorded frequency coordination protection) but not actually utilized, this represents spectrum warehousing. One of the obvious effects of spectrum warehousing, besides restricting potential use by co-primary users, is restriction of new services in or near the frequencies of interest. Many times the Commission has publicly taken a position against spectrum warehousing.[2,3] We encourage the Commission to maintain that position with this proceeding. Licensing should be based upon utilization defined in such a way as to facilitate satellite operations.

LICENSE DATABASE ENHANCEMENT

Both Google Fiber and Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (EIBASS) commented that the existing International Bureau Filing System (IBFS) is seriously flawed due to inaccurate, incomplete, or missing information. Such information includes equipment parameters, site location and licensee contact information. This situation is well known to NSMA's membership. If we clean up the IBFS database it will do a lot for spectrum reuse, both for satellite and terrestrial operators.

Many earth station licenses still indicate analog operation yet nearly all operators have transitioned to digital transmission. From a coordination perspective, this is significant. A C band analog uplink transmitter can run full power of 3 kw while a digital transmitter typically operates with less than 100 watts. We believe that legacy analog licensing is a result of long license periods, during which the nature of the earth station operations evolve. A shorter license period might keep licenses more current with actual technology used.

For egregious cases where licensed satellite earth stations do not actually exist (which is not a rare occurrence, based on the Google Fiber and EIBASS analyses), spectrum is unnecessarily warehoused. For cases where the stations are not located where they are licensed, risk of interference is increased. Both of these situations could be minimized by performing an audit of the license data base for coordinate accuracy, among other parameters. NSMA would be willing to participate in efforts to correct these errors.

CONCLUSION

We support FWCC's petition as it regards eliminating frequency warehousing. We believe that the satellite operators should be allowed to license such spectrum as necessary to accomplish their purposes. However, if they don't need some of the spectrum, only the spectrum they do need should be registered with the FCC so other legally entitled services can access the remaining bandwidth. We also support efforts to correct the known errors in the satellite earth station data

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[2] *Intelsat Licensee LLC*, 27 FCC Rcd 11234 at ¶ 15 (IB 2012) (citing "Commission's policy against spectrum warehousing")

[3] *Redesignation of the 17.7-19.7 GHz Frequency Band*, 17 FCC Rc. 24248 at ¶ 92 (2002) (citing "policy of preventing spectrum warehousing and promoting more efficient use of the spectrum by incumbents and new entrants alike")

base. Both of these positions are clearly in the public interest.

Respectfully submitted,

/s/ George Kizer
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