

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
International Bureau Seeks Comment on)	IB Docket No. 16-185
Recommendations Approved by World)	
Radiocommunication Conference Advisory Committee)	

COMMENTS OF SES AMERICOM, INC. AND O3B LIMITED

SES Americom, Inc. and its affiliate O3b Limited (collectively “SES”) submit these comments in response to the Public Notice issued by the Commission seeking comment on the draft recommendations prepared by its World Radiocommunication Conference 2019 (“WRC-19”) Advisory Committee (“WAC”), which are contained in Attachment A to the Public Notice, and draft proposals provided by the National Telecommunication and Information Administration (“NTIA”), which are contained in Attachment B to the Public Notice.¹

Specifically SES urges the Commission to recommend to the State Department that (1) under Agenda Item 1.13 View A be adopted for the 47.2-50.2 GHz band; (2) under Agenda Item 1.14 View D be adopted for the 27.9-28.2 GHz band unless the issue of protecting the mobile service is resolved, and View A be adopted for the 24.75-25.25 GHz and 27-27.5 GHz bands; and (3) under Agenda Item 1.6 the WAC consensus view be adopted.

¹ Public Notice, International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee, IB Docket No. 16-185, DA 18-1017 (Oct. 3, 2018) (“Public Notice”).

I. AGENDA ITEM 1.13

SES supports View A for Agenda Item 1.13. View A proposes no change to the Radio Regulations in the 48.2-50.2 GHz band, taking into account the identification of this band in ITU-R Region 2 for use by high-density applications in the fixed-satellite service (“HDFSS”) through footnote 5.516B, the second Spectrum Frontiers Order decision to reserve this band for exclusive FSS use, and the critical requirement for core spectrum for regional and international GSO and NGSO satellite operations. View A also proposes that IMT may be accommodated in the 47.2-48.2 GHz band under certain conditions.

SES notes the NTIA proposal for no change in any portion of the 47.2-50.2 GHz band and agrees with the NTIA proposal with respect to the 48.2-50.2 GHz band. Any change to be made in the 47.2-48.2 GHz band should include conditions to permit continued deployment of FSS earth stations and protection for FSS space stations as proposed in View A.

II. AGENDA ITEM 1.14

SES supports View D with respect to the 27.9-28.2 GHz band if the question of protecting mobile services is not resolved. SES otherwise supports View A with respect to the 24.75-25.25 GHz and 27.27.5 GHz bands.

27.9-28.2 GHz Band

No change should be made to the HAPS designation in the 27.9-28.2 GHz band unless the following issue has been resolved. The power flux density (“pfd”) levels in the mask in resolves 2 of Draft New Resolution [E114] in Proposal No. USA/1.14/20 from View A under Agenda Item 1.14 are intended to protect the mobile service from HAPS-to-ground emissions in the 27.9-28.2 GHz band. SES believes the pfd mask proposed in View A to Agenda Item 1.5 represents the most appropriate mask because it offers adequate protection for mobile services from aeronautical-like services. As noted in a separate filing submitted by SES, Inmarsat and

Thales,² the pfd mask proposed in View A of Agenda Item 1.5 has broad support and a demonstrated track record of protecting mobile services. It therefore represents the best balance between protecting mobile services and allowing aeronautical services or HAPS services to operate.

24.75-25.25 GHz and 27-27.5 GHz Bands

In addition, after discussing with the proponents of View A the technical and regulatory elements associated with HAPS designation in the 24.75-25.25 GHz and 27-27.5 GHz bands, SES no longer has a concern with the View A proposal in these bands.

III. AGENDA ITEM 1.6

SES supports the WAC consensus proposal which establishes a regulatory framework for sharing between the GSO and NGSO FSS satellite networks and systems operating in the Q- and V-band frequencies. This proposal introduces a modification of the FSS limits for new NGSO satellite networks in order to maintain the current operating environment experienced by the earth exploration-satellite service (“EESS”) (passive) stations operating in the 50.2-50.4 GHz band. The WAC proposal retains the current GSO limits to protect the EESS that have been in place since WRC-07 as this will ensure the stability of the operating environment for both services.

SES opposes the limits included in the NTIA proposal for Agenda Item 1.6. Revising limits for GSO satellites is outside of the scope of Resolution 159 (WRC-15). In addition, the proposed limits would place severe constraints on GSO operations and make large portions of spectrum unusable.

² Comments of Inmarsat, Thales, and SES Americom, Inc., *filed in* IB Docket No. 16-185, at 3-5 (filed Oct. 17, 2018).

Regarding the proposed NGSO limits SES is concerned that when developing such limits mitigation techniques were not taken into account. For example, sharing of ephemeris data could be a simple and effective way to avoid passive sensors without severely constraining NGSO operations.

IV. CONCLUSION

The Commission should recommend to the Department of State the proposals described above for Agenda Items 1.13, Agenda Item 1.14 and Agenda Item 1.6.

Respectfully submitted,

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