

February 22, 2019

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

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

Dear Ms. Dortch,

On February 19, 2019, the undersigned and other representatives of PSSI Global, L.L.C. met at the Commission with Commissioner Michael O'Rielly and his Legal Assistant, Erin McGrath. In addition to myself, PSSI Global was represented by its C.E.O., Robert Lamb, and PSSI Global's consultant, Peter Engel of WellsWentworth LLC.

Mr. Lamb gave a comprehensive overview of PSSI and its operations, its role as the major mobile transportable company in the C-band and the dependence of programming on the continued availability of robust, full-band/full-arc licensing policies. Mr. Lamb also shared some descriptive literature with the Commissioner regarding PSSI Global's operations.

Mr. Lamb explained that for live events, reliability is critical. Neither fiber nor Ku-band could provide an adequate, complete substitute for C-band and pointed out how in a major recent pay-per-view event, although it had been envisioned that the primary feed would be done by fiber, with PSSI Global providing the backup on C-band, the decision had been made to switch to the PSSI Global "backup" on C-band because of the superior programming quality. Ku-band also poses problems of reliability when it rains and is not capable of providing the degree (or number) of multiple paths of transmission.

PSSI Global noted that if the Commission were to determine to reallocate some of the band for terrestrial mobile use, it was preferable to do so by means of a variation of the C-Band Alliance proposal, but that repurposing more than 100 MHz would result in substantial limitations on the current users of the C-band, noting the greatly reduced number of transponders that would be available for so-called "occasional users" like PSSI Global. He explained that frequency coordination can be challenging under present circumstances and that decreased bandwidth would leave fewer RFI clearance options to avoid possible terrestrial interference.

Mr. Lamb also noted that there were ongoing discussions with the C-Band Alliance regarding potential 5G interference and required shielding. Nevertheless, although the filtering mechanisms being proposed may work for fixed latitude/longitude identified locations like PSSI Global's Pittsburgh teleport, there is serious concern whether is possible for the filters to work with the company's mobile satellite truck facilities that are licensed for operations everywhere without a designated latitude and longitude.

STEPHEN DÍAZ GAVIN

RIMON, P.C. -- 1717 K Street NW, Suite 900, Washington, D.C. 20006

Direct: +1-202-871-3772 | Mobile +39-348-0497-567 | Mobile +1-202-375-4447 | stephen.diaz.gavin@rimonlaw.com

Finally, Mr. Lamb also explained the rationale for representation of satellite users like PSSI Global on any transition administration. If the Commission were to adopt a proposal like the “market based” allocation plan offered by the C-Band Alliance, although it would be necessary to negotiate contractual commitments by the satellite carriers, it also would be important to have verifiable, binding commitments by the satellite carriers regarding interference protections and financial reimbursements incorporated by the Commission either in the text of the report and order enacting new rules or in any license modification.

As noted above, PSSI Global had provided the Commission and Ms. McGrath information regarding the company’s operations, copies of which are attached to this *ex parte* notice.

Pursuant to Section 1.1206(b)(2) of the Commission’s Rules, an electronic copy of this letter is being filed in the above-referenced docket, with copies to the Commission participants. Please direct any questions regarding this filing to me at stephen.diaz.gavin@rimonlaw.com or at 202-871-3772.

Respectfully submitted,



Stephen Díaz Gavin

Attachments

cc: Commissioner Michael O’Rielly
Erin McGrath