Comments by AlphaStar

Before the

**FEDERAL COMMUNICATIONS COMMISSION**

Washington, DC 20554

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| In the Matter of  Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz | )  )  ) | )  GN Docket No. 17-183 |

**To:** The Commission

Re: Intelsat and Intel proposal will protect medium and small size satellite service providers

AlphaStar and AlphaStar America LLC (hereinafter referred to as “AlphaStar”), founded in 1994, is one of the original four satellite television broadcast providers. The company is now engaged in both satellite broadcasting and broadband. AlphaStar was one of the early entities to acquire FCC mmWave licenses over time, including C Band, Ku Band, Ka band and Microwave licenses.

AlphaStar has a strong historical and financial interest in the FCC decision regarding the use of the C Band (or Mid-Band) 37.00-42.00 GHz and other mmWave spectrums. The company intends to continue to offer satellite services and would be adversely affected if the use of these licensed spectrums were opened to wireless networks without adequate safeguards. The company seeks protection from wireless providers' interference. AlphaStar urges the FCC to protect satellite service providers, especially medium and small operators.

C Band spectrum belongs to satellite providers, and it is the bread and butter of small and medium size satellite operators, especially in rural and remote areas. However, AlphaStar recognizes the need for additional spectrum to promote 5G wireless applications and recognizes that C Band offers excellent technical specifications for that purpose.

If the FCC were to allow the use of satellite bands for wireless applications, this could damage the medium and small size satellite operators, if there is no protection. From the comments submitted here, it seems that there are three options to permit the coexistence of both satellite and wireless providers.

The first option is the sale of the licenses to use mmWave spectrums to wireless providers by satellite operators. The sale option is by definition going out of business for satellite operators, especially medium and small operators, as they need the licenses to operate.

The second option is sharing the spectrum between satellite and wireless providers. This option is akin to sharing between David and Goliath. In real life, the underdog rarely wins.

The third option was proposed by Intelsat and Intel. AlphaStar believes that the healthy survival of medium and small satellite operators can be made possible by the Intel and Intelsat proposal.

AlphaStar supports this proposal because it will allow satellite providers to continue with their business as usual, since they will not surrender their licenses, and will also allow the wireless providers to utilize a portion of the spectrum without interference. In a submission on September 2nd, Intel and Intelsat wrote, “Intelsat and Intel urge the Commission to allow co-primary terrestrial mobile operations in the 37.00-42.00 MHz band through commercial agreements between terrestrial mobile interest and primarily affected FSS satellite operators.”

Furthermore, this proposal will permit the adoption of 5G wireless applications sooner than would any other alternative. Other options to reallocate spectrum that may infringe on the rights of satellite providers risk a lengthy legal proceeding, which would lead to the delay of the adoption of 5G wireless applications. This would be contrary to the public interest and the announced objective of the FCC.

Let us not forget that satellite services will contribute immensely and uniquely to the advancement of some of the critical 5G applications.

Respectfully submitted,

Mahmoud Wahba

teleport@alphastar.com

203-979-2700