

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

In the Matter of )  
 )  
Further Streamlining Part 25 Rules Governing ) IB Docket No. 18-314  
Satellite Services )

## COMMENTS OF MAXAR TECHNOLOGIES INC.

Maxar Technologies Inc. (“Maxar”) appreciates the opportunity to comment on the Commission’s proposals “to repeal or modify unnecessarily burdensome rules in Part 25 governing satellite services, such as annual reporting requirements.”<sup>1</sup> Maxar broadly supports the FCC’s goal to “greatly simplify [its] licensing and regulation of satellite systems.”<sup>2</sup>

The NPRM aims to unleash innovative solutions of the private sector by removing cumbersome and duplicative filing and reporting processes. Modernization and simplification of rules under Part 25 will enable industry leaders, like Maxar, to redirect resources toward technological advancements that will enhance the delivery of services to our customers and the general public. Further, it will help drive competition and innovation by lowering the barriers to entry for smaller companies in the commercial space industry. These objectives align with the White House’s Space Policy Directives to “[f]oster continued growth and innovation in the U.S. commercial space sector” through agency action to “streamline processes and reduce regulatory burdens that could inhibit commercial sector growth and innovation, enabling the U.S.

<sup>1</sup> *Further Streamlining Part 25 Rules Governing Satellite Services*, IB Docket No. 18-314, Notice of Proposed Rulemaking, FCC 18-165, ¶ 1 (rel. Nov. 15, 2018) (“*NPRM*”).

$$NPRM \text{ at } \P 1.$$

commercial sector to continue to lead the world in [commercial space]-related technologies, goods, data, and services on the international market.”<sup>3</sup>

Maxar is a leading global provider of advanced space technology solutions, delivering unmatched end-to-end capabilities in satellites, robotics, Earth imagery, geospatial data, analytics, and insights. The world’s foremost businesses and governments trust us to solve their most mission-critical challenges with confidence. With roughly 5,900 employees in over 30 global locations, Maxar was formed by uniting DigitalGlobe, SSL, MDA, and Radiant Solutions. Every day, billions of people rely on Maxar to communicate, share information and data, and deliver global insights.

Maxar strongly supports Chairman Pai’s goal in this proceeding to “simplify the FCC’s satellite licensing process to encourage the launch of new satellite systems” and “ensure that the United States remains the most desirable country in the world for licensing and operating satellites.”<sup>4</sup> Below, Maxar provides input on the Commission’s specific proposals.

## **I. THE COMMISSION SHOULD ELIMINATE UNNECESSARY ANNUAL REPORTING REQUIREMENTS.**

Maxar strongly encourages the Commission to repeal the Section 25.170 annual reporting requirements and transition point of contact information to Section 25.171.<sup>5</sup> Requiring annual disclosures of authorized satellites or spectrum unavailable for service and construction progress of replacement satellites places unnecessary burdens on satellite operators. These reports consume substantial resources and employee time to prepare, verify, and file with the

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<sup>3</sup> The White House, Presidential Memoranda, *Space Policy Directive-3, National Space Traffic Management Policy* (Jun. 18, 2018).

<sup>4</sup> Statement of Chairman Ajit Pai, *Further Streamlining Part 25 Rules Governing Satellite Services*, IB Docket No. 18-314.

<sup>5</sup> *NPRM* at ¶ 17.

Commission. Maxar therefore concurs with the Commission’s view that these reporting requirements “may be duplicative or unnecessary.”<sup>6</sup>

Recognizing the importance of interference avoidance and prompt resolution of possible disputes through coordination agreements, Maxar agrees that the Commission should retain the annual requirement to provide up-to-date company point of contact information through Section 25.171.

## **II. THE COMMISSION SHOULD ELIMINATE MINOR EARTH STATION MODIFICATION NOTIFICATIONS.**

Similarly, where minor earth station modifications do not increase the risk of interference to other users, those notification requirements should be eliminated. The NPRM seeks comment on the removal of reporting requirements for minor modifications such as those that “do not increase power, add frequencies, or repoint the antennae beyond any coordinated range” and “the addition of new transceiver and antenna combinations to an existing blanket earth station.”<sup>7</sup>

Maxar believes that the removal of these requirements is a common-sense step. Where the risk of interference to other users is not increased, such modifications are ministerial, unnecessarily draining resources of both the Commission and earth station operators. Maxar further notes that the reliability of such information filed with the Commission will not be unduly impacted.<sup>8</sup>

## **III. EXTENDING THE BUILDOUT REQUIREMENTS FOR INDIVIDUALLY LICENSED EARTH STATIONS IS A PRACTICAL AND NECESSARY ADJUSTMENT.**

The Commission rightly notes that “there is a disconnect between the one-year earth station buildout requirement and the time allowed for a satellite to be launched and brought into

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<sup>6</sup> *Id.*  
<sup>7</sup> *Id.* at ¶ 22.  
<sup>8</sup> *Id.* at ¶ 23.

operation...[This disconnect] could mean that a significant investment would remain unused for as long as four years.”<sup>9</sup>

The FCC should modernize its buildout requirements, updating them to align with the practical needs and realities of the commercial space industry. This will provide greater certainty to satellite operators, investors, customers, and the public when developing space station and gateway earth station plans.

Maxar therefore supports the Commission’s proposal to “ensure certainty and allow more efficient satellite design [by allowing] earth stations authorized through Section 25.136 [to] have a buildout requirement defined by the date associated satellite becomes operational, up to five years for a GSO satellite or six years for an NGSO satellite if the satellite is put into operation at the end of its milestone period[.]”<sup>10</sup> This is a pragmatic and well-reasoned change in the rules.

#### **IV. THE PROPOSAL FOR COMPREHENSIVE AUTHORIZATION FOR SPACE STATION AND EARTH STATION OPERATIONS SHOULD BE EXPANDED TO NGSO SATELLITE SYSTEMS.**

The Commission’s proposal to adopt comprehensive authorization for satellite systems is limited in the NPRM to an optional licensing structure of a single network license for GSO FSS space stations and earth stations.<sup>11</sup> Maxar appreciates the reasoning and practicality behind a single, comprehensive authorization process but believes the FCC should extend such a licensing structure to other bands and services.<sup>12</sup>

A unified license structure, for other services including NGSO satellite systems, would consolidate and simplify the complex and complicated space system authorization process. This would significantly benefit operators, the Commission, and other stakeholders. Operators would

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<sup>9</sup> *Id.* at ¶ 16.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.* at ¶ 6.

<sup>12</sup> *See id.* at ¶ 9.

be able to file more coherent and complete applications, reducing time, expense, and resources necessary to support multiple, duplicative filings. Additionally, it would i) consolidate and streamline redundant reviews by the FCC's International Bureau Staff, and ii) the expansion would also provide more complete records to stakeholders interested in information provided in authorizations of a whole system, instead of discrete and separate space and earth station licenses across multiple filings.

## **V. CONCLUSION.**

Maxar appreciates the opportunity to provide comments on the Commission's proposed *Streamlining of Part 25 Rules Governing Satellite Systems*. This effort aligns with the Commission's leadership in reducing unnecessary red tape for satellite operators, the Administration's overall goal of promoting the U.S. commercial space industry, and will benefit satellite service customers and the general public. Modernizing and simplifying the FCC's rules under Part 25 will allow companies to spend their precious time and money on developing new innovations and job creation rather than wasting it on needless bureaucracy.

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_

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