

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

REPLY COMMENTS OF IRIDIUM COMMUNICATIONS INC.

I. INTRODUCTION

Iridium Communications Inc. (“Iridium”) continues to support the Federal Communications Commission’s (“Commission’s” or “FCC’s”) efforts to further streamline Part 25 rules for satellite services.¹ In particular, Iridium: (i) does not object to a commenter’s proposed revisions to Section 25.118, which would permit earth station operators to make certain additional discrete changes to their earth station operations without notifying the Commission; (ii) objects to the National Academy of Sciences – Committee on Radio Frequencies (“CORF”)’s suggestions, based on Radio Astronomy Services (“RAS”) considerations, to adopt an extensive set of OOB interference protection levels for RAS across numerous frequency bands; and (iii) does not object to CORF’s proposal to protect RAS against spurious emissions.

II. DISCUSSION

A. The Commission Should Allow Additional Discrete Changes to be Made to Earth Station Authorizations Without Notification

Commenters overwhelmingly supported the Commission’s proposal to revise Section 25.118 of the Commission’s rules to allow earth station operators to make certain modifications

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

to their earth station authorizations without notification to the Commission.² In addition to the Commission’s proposal to apply this “no notification” policy to the modifications identified in Section 25.118(a)(4),³ EchoStar proposes that the Commission eliminate the notification requirement for other earth station modifications identified in Subsections 25.118(a)(1)-(3), i.e., adding blanket licensed remote terminals, changing the status of a private carrier license to common carrier within certain parameters, and changing points of communication for satellites provided the operator “does not repoint the earth station’s antenna beyond any coordinated range.”⁴

Iridium does not object to EchoStar’s proposal to permit earth station operators to add blanket licensed remote terminals under Section 25.118(a)(1) of the rules without notification to the Commission. If that change is made, however, then additional language is required. Section 25.118(a)(1) of the rules only refers to coordination procedures with terrestrial services required under Section 25.251. But increases in the number of blanket licensed remote terminals implicate coordination with satellite services, too. Accordingly, any such increases also should be subject to applicable satellite service frequency coordination requirements and the terms of

² Comments of Commercial Smallsat Spectrum Management Association Comments at 4 (“CSSMA Comments”); Comments of Maxar Technologies Inc. at 3; Comments of EchoStar Operating Corp. and Hughes Network Systems, LLC at 8 (“EchoStar Comments”); Comments of Intelsat License LLC at 2, 8; Comments of WorldVu Satellites Limited at 7; Comments of SES Americom, Inc., O3b Limited at 8-9 (“SES Comments”); Comments of ViaSat, Inc. at 11-12 (“ViaSat Comments”). All Comments referenced were filed in IB Docket No. 18-314 on March 18, 2019.

³ NPRM, Appendix A. The Commission’s proposal reflects Iridium’s suggestion in response to the Commission’s 2016 Biennial Public Notice, *see* September 17 *ex parte*, that the Commission permit earth station operators to make discrete changes to their earth station operations without notification to the Commission if the changes do not involve: (1) an increase in EIRP or EIRP density (either main lobe or off-axis); (2) additional operating frequencies; (3) a change in polarization; (4) an increase in antenna height; (5) antenna repointing beyond the coordinated range; or (6) a change from the originally authorized coordinates of more than 1 second in latitude or longitude for stations operating in frequency bands shared with terrestrial systems or more than 10 seconds of latitude or longitude for stations operating in frequency bands not shared with terrestrial systems.

⁴ 47 C.F.R. § 25.118(a)(1)-(3).

satellite coordination agreements. With the inclusion of this clarification, Iridium has no objection to EchoStar's proposal.

B. The Commission Should Reject CORF's Proposed Additional OOBE Standards

The majority of commenters support the Commission's proposal to replace the Section 25.202(f) out-of-band emissions ("OOBE") rule with Recommendation ITU-R SM.1541-6.⁵ There should be no impediment, therefore, to adopting this proposal. CORF, however, seeks changes that extend well beyond what the Commission proposed. CORF identifies more than 20 bands for which it seeks special protection for RAS or Earth Exploration-Satellite Service ("EEES") services based on over 10 OOBE standards.⁶

CORF's proposal opens up the issue of protection standards for passive bands generally, which is outside the scope of this rulemaking. Addressing this issue would require an independent petition for rulemaking; notice to interested parties; and a record that focuses specifically on OOBE protection for passive bands. None of these preconditions has been satisfied. Consequently, the Commission should reject CORF's OOBE proposal.⁷

C. Iridium Has No Objection to CORF's Proposal Regarding Spurious Emissions

CORF also notes that 25.202(f) addresses spurious emissions in Section 25.202(f)(3) in addition to OOBE. To preserve spurious emission protection, CORF asks that the Commission either: (a) retain the existing language of Section 25.202(f)(3) for spurious emissions, or (b) seek

⁵ Comments of Eutelsat S.A. at 3; CSSMA Comments at 2-3; Intelsat Comments at 2; EchoStar Comments at 6-7; SES Comments at 5; Viasat Comments at 9.

⁶ Comments of National Academy of Sciences – Committee on Radio Frequencies at 9-11 ("CORF Comments").

⁷ CORF also raises the prospect of interference to RAS from Iridium's constellation. CORF Comments at 9-11. The Commission, however, expressly considered and resolved this issue when it granted authority for launch and operation of the Iridium NEXT satellites. See *Iridium Constellation LLC, Application for Modification of License to Authorize a Second-Generation NGSO MSS Constellation*, Order and Authorization, 31 FCC Rcd 8675, 8685, 8689, ¶¶ 28-30; 51 (2016).

additional comment concerning the adequacy of ITU-R SM.329-12 (“Unwanted Emissions in the Spurious Domain”) as a replacement. Iridium’s operations satisfy both standards, and Iridium has no objection to either course of action.

III. CONCLUSION

The Commission should adopt its proposed changes to Section 25.118 and may determine that modifications under Sections 25.118(a)(1)-(3) also do not require notification to the Commission provided the Commission clarifies that changes under 25.118(a)(1) are subject to coordination with both terrestrial and satellite operations. The Commission should reject CORF’s extensive proposals regarding passive services and OOBE standards as beyond the scope of this proceeding. The Commission may adopt either of CORF’s proposals for protecting passive services from spurious emissions, *i.e.*, preserving Section 25.202(f)(3) of the rules or seeking additional comment as to whether ITU-R SM.329-12 would be a suitable replacement.

Respectfully submitted,

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