



March 4th, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

Amb-OS Media, LLC (“Amb-OS”) writes to express its support for the Market-Based Approach proposed by the C-Band Alliance (“CBA”) to repurpose 200 MHz of C-band spectrum (inclusive of a 20 MHz guard band) for flexible use. Of the various proposals in the record, the Market-Based Approach is the clear choice.

The CBA has explained why repurposing 200 MHz is a sound approach because it will ensure that current satellite customers, like Amb-OS, can continue utilizing the C-band to distribute audio and video content to American consumers. Moreover, CBA members have committed publicly to launching new satellites to ensure that they have the same capacity to carry video and other services in 300 MHz of spectrum that they have today in 500 MHz.¹ As a result, under the Market-Based Approach Amb-OS and other current C-band users will continue to be served in the C-band, which is uniquely situated for nationwide content distribution. No other plan explains how the programmers and broadcasters that rely on C-band spectrum today to reach over 100 million households will be protected should spectrum be repurposed for flexible use as proposed by the FCC. Specifically, the approximate 1600 Christian radio stations and their millions of listeners that Amb-OS reaches with programs from over one hundred ministry offerings could be placed at risk if an ill-conceived non-market-based approach (as has been proposed by other parties) is endorsed by the Commission.

Some parties have suggested that there is a path to clearing more than 200 MHz of spectrum by moving content distribution to alternative frequency bands or to fiber. But the record in this proceeding is unequivocal—fiber is not an adequate substitute for C-band content distribution.²

¹ See, e.g., Letter from Jennifer D. Hindin, Counsel for the C-Band Alliance (Feb. 7, 2019) (“CBA *Ex Parte* Letter”).

² See, e.g., Comments of Comcast Corporation and NBCUniversal Media, LLC, GN Docket No. 18-122, at 18 (Oct. 29, 2018); Comments of the C-Band Alliance, GN Docket No. 18-122, at 11 (Oct. 29, 2018); Reply

Current fiber deployments are not nearly extensive enough to replace nationwide C-band coverage and lack the C-band's reliability and resiliency. Even where fiber is available, it is vastly more expensive than the C-band satellite service. Moreover, building fiber out with the redundancy that is required for video and/or radio programming distribution is a decades-long process. And Ku-band does not provide the quality and reliability that Amb-OS and its served radio stations require.

Amb-OS agrees that repurposing more than 200 MHz would certainly result in loss of C-band service for at least some existing satellite customers.³ Indeed, the CBA notes that to clear even 200 MHz without harming existing customers, several new satellites must be built and launched. Amb-OS believes that only the CBA and the Market-Based Approach can deliver on these additional satellites. Amb-OS also believes that only the CBA can successfully handle the transition of existing C-band services to a 300 MHz satellite environment. The other proposals on the record make no realistic provision for protection of current users of C-band spectrum and therefore must be rejected.

To the extent that the FCC decides that C-band spectrum must be repurposed, Amb-OS believes that only 200 MHz should be repurposed and that only one proposal under consideration by the FCC will protect incumbent C-band customers while repurposing that amount of spectrum. Amb-OS therefore endorses the CBA's Market-Based Approach and urges the Commission to adopt it.

Respectfully submitted,



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Comments of the Content Companies, GN Docket No. 18-122, at 4 (Dec. 11, 2018); Comments of Cumulus Media Inc. and Westwood One, LLC, GN Docket No. 18-122, at 5 (Oct. 29, 2018); Comments of GCI Communication Corp., GN Docket No. 18-122, at 12 (Oct. 29, 2018).

³ See, e.g., CBA *Ex Parte* Letter.