

May 9, 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 May 7, 2019, along with other representatives of PSSI Global, L.L.C. (“PSSI”), I met at the Commission with Commissioner Jessica Rosenworcel and Umair Javer, her Legal Advisor for Wireless and International Matters, to discuss PSSI’s concerns about developments in the C-band proceeding. In addition to myself, PSSI was represented by its C.E.O., Robert Lamb, PSSI’s President Strategic Television, Matt Bridges, and the company’s Vice President Strategic Television; A.J. Miceli. Also present on behalf of PSSI was its consultant, Peter Engel of WellsWentworth LLC.

The purpose of the meeting was to update the Commissioner and her staff about the growing technical concerns that PSSI has regarding the proposals to repurpose part of the C-band for terrestrial mobile use. Mr. Lamb briefly recounted the company’s general concern, which had not changed since PSSI’s prior meeting with the Commissioner’s office, regarding repurposing of any more than 200 MHz of spectrum for 5G mobile telephone operations. Such an outcome would severely restrict occasional use of the C-band spectrum, if not eliminate it because INTELSAT and other satellite operators may want to sell more satellite time to full time customers, leaving less available for occasional users like PSSI. He and Mr. Bridges explained the particular circumstances of occasional use in the C-band that would be impacted by loss of spectrum. Mr. Lamb also acknowledged certain efforts by the C-Band Alliance to reach out to customers with some technical solutions to protect them from interference, but noted that those solutions would not protect transportable antennas like those used by PSSI.

Mr. Miceli then addressed technical aspects of PSSI’s transmission of live events and the CBA filter proposal. Mr. Miceli explained the technical problems he had determined would be encountered if a portion of the C-band were to be repurposed for 5G mobile use. Although the filtering mechanisms being proposed by CBA may work for fixed latitude/longitude identified locations like PSSI’s Pittsburgh, Pennsylvania teleport, there is serious concern whether it 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. Mr. Miceli explained that he had concluded that the filters could not provide protection for transportable antennas like those used by PSSI.

Mr. Lamb also noted that there will be obstacles to frequency coordination, upon which C-band occasional use depends to ensure transmission of programming. PSSI is concerned that an issue going forward will be

coordinating frequencies and power output in a comprehensive manner. If PSSI can know the various frequencies in play at each event location, the frequency coordination and power output can be managed. However, an unintended consequence of policies involving new small cell wireless cells, for example, will be that there will be no notification whatsoever of many new 5G transmitter locations, which would make a complete frequency coordination nearly impossible to perform.

At the conclusion of the meeting, PSSI also gave the Commissioner information brochures 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: The Hon. Jessica Rosenworcel
Umair Javer