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VIA ELECTRONIC FILING

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

Re: *Ex Parte Communication*, GN Docket No. 18-122

Dear Ms. Dortch:

Recently, CBS Corporation, Discovery, Inc., The Walt Disney Company, Fox Corp., Univision Communications Inc., and Viacom Inc. (collectively the “Content Companies”), all of whom are customers of members of the C-Band Alliance (“CBA”), filed an *ex parte* letter¹ describing a series of meetings they had with the legal advisors of Chairman Pai and the four commissioners. The Content Companies attached a document that, among other things, described the types of safeguards the Content Companies believe are necessary to preserve the critical C-Band distribution system should the Commission allow terrestrial mobile use in a portion of the 3700-4200 MHz band (“C-Band”), as the agency has proposed.

The attachment highlights three essential protections the Content Companies seek in a C-Band transition plan: (1) technical safeguards to protect FSS signals from harmful interference from terrestrial mobile operations; (2) satellite capacity to ensure current users have C-Band service continuity; and (3) FCC oversight and enforcement of the repacking process to ensure protection of video downlinks. The CBA has discussed with the Content Companies the safeguards and agrees with all of them. Importantly, of the proposals being considered by the Commission, only the CBA’s offers the safeguards the Content Companies seek. Because the Content Companies are customers of CBA members, it is not surprising that our interests in this proceeding align. The CBA’s proposal is designed to quickly repurpose some spectrum *while ensuring no loss of C-Band service by our customers or their end users*.

Determining whether, how much, and under what technical parameters the C-Band can be repurposed for terrestrial mobile use – while fully protecting incumbent operations – is extremely complex. The Content Companies have articulated clearly how important their services are to American consumers and why C-Band is critical to their businesses. The CBA is committed to ensuring their continued access to the C-Band in an interference-free environment

¹ See Letter from Matthew S. DelNero, Counsel for the Content Companies, to Ms. Marlene H. Dortch, FCC, GN Docket No. 18-122 (May 2, 2019) (“May 2 *Ex Parte*”).

May 15, 2019

Page 2

before, during, and after the repurposing of 200 MHz.² Indeed, the CBA has already made two recent filings detailing: (1) CBA members' binding customer commitment to protect satellite service quality and reliability in the remaining 300 MHz of spectrum,³ and (2) a proposed Transition Implementation Process that would ensure uninterrupted service to existing satellite customers.⁴

The CBA therefore has no objections to the safeguards requested by the Content Companies in their May 2 *Ex Parte* and will continue to discuss with them specific provisions – including technical rules – the Commission could adopt to implement the safeguards.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

_____/s/
Jennifer D. Hindin
Counsel for the C-Band Alliance

² The CBA has been discussing its proposed technical rules with the Content Companies and expects to put further technical information on the record as a result of those discussions.

³ Letter from Henry Gola, Counsel for the C-Band Alliance, Customer Commitment and Attachments, GN Docket No. 18-122 (Apr. 3, 2019).

⁴ Letter from Jennifer D. Hindin, Counsel for the C-Band Alliance, Transition Implementation Process, GN Docket No. 18-122 (Apr. 9, 2019).