

May 29, 2018

VIA ELECTRONIC FILING

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

Re: *Notice of Ex Parte Presentation*
GN Docket Nos. 17-183, 18-122

Dear Ms. Dortch:

Per FCC Rule 1.1206, this letter provides notice that on May 24, 2018, the representatives of LinkUp Communications Corporation (“LinkUp”), Intelsat Corporation (“Intelsat”), and SES Americom, Inc. (“SES”) listed in Attachment A (collectively, the “Parties”) jointly participated in three separate meetings with representatives from the Commission listed in Attachment B.

The LinkUp representatives noted that there is still tremendous reliance on C-band today for the distribution of video and audio programming. They also described how their company serves as broadcast integrator to second- and third-tier broadcasters, many of which are non-commercial and/or serve smaller communities. These smaller broadcasters rely upon C-band communications for as much as 98% of the programming distributed by their stations into local communities. The LinkUp representatives also stated that C-band is increasingly utilized by the broadcasters they serve due to its superior quality. In the past 24 months, they have installed approximately 50 receive-only antennas for their customers, more C-band activity than they have experienced in the preceding 16 years. They further stated that based upon the number of C-band downlink antennas serving a small community of 120,000 citizens in Florida, extrapolated to the entire U.S. population, the number of C-band downlinks serving U.S. communities could total between 25,000 and 30,000.

The LinkUp representatives expressed their appreciation for the Commission’s effort to obtain information about receive-only earth station operations. They described their efforts to publicize the 90-day filing window and to encourage receive-only earth station operators to register. They noted, however, two specific concerns that they believe are serving as practical deterrents to obtaining registrations from receive-only antenna operators.

First, the LinkUp representatives noted that the fee associated with filing numerous applications is proving to be a deterrent to registration for many receive-only antenna operators. They noted that the application fee is a factor both for larger operators with many antennas -- for whom the filing costs could total in the tens of thousands of dollars or higher -- as well as for the smaller “mom and pop” operators for whom filing fees in the hundreds of dollars is a financial burden.

Second, the LinkUp representatives discussed how the complexity of the forms and the need to file individual Form 312s for each site they operate is serving as a deterrent to registering for some receive-only operators. They noted that because many receive-only operators elected not to register in the past, many are unfamiliar with the FCC's Form 312 and Schedule B and, additionally, do not have the technical staff required to complete multiple applications in a timely fashion. The Parties asked whether the Commission would consider allowing some method of batch filing, whereby multiple receive-only antennas, along with location information, could be included in a single application.

The Parties agreed that it is important that the FCC obtain an accurate count of C-band downlinks and expressed their willingness to help the Commission achieve that goal. They stressed that obtaining some form of relief on the concerns addressed above would, in their opinion, greatly improve the likelihood of receive-only antenna operators registering their antennas. Such a result would serve the public interest by resulting in a more accurate understanding by the Commission of the magnitude of Fixed Satellite Service use of the C-band downlink nationwide.

Finally, the LinkUp representatives distributed the attached presentations to the Commission representatives.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

_____/s/_____
Susan H. Crandall
Associate General Counsel
Intelsat Corporation

_____/s/_____
Petra Vorwig
Senior Legal & Regulatory Counsel
SES Americom, Inc.

ATTACHMENT A

LinkUp Communications Corporation:

Mark Johnson, Founder/Operations
Karen R. Johnson, Co-Founder/Marketing

Intelsat Corporation:

Henry Gola, Wiley Rein LLP, outside counsel to Intelsat

SES Americom, Inc.:

Petra Vorwig, Senior Legal & Regulatory Counsel (for Bender and McGrath meetings only)

ATTACHMENT B

Office of Chairman Ajit Pai

Rachael Bender

Office of Commissioner Michael O’Rielly

Erin McGrath

Office of Commissioner Brendan Carr

Will Adams