



June 1, 2018

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs, WC Docket No. 18-89

Dear Ms. Dortch:

The Satellite Industry Association (“SIA”),¹ the Global VSAT Forum (“GVF”),² and the EMEA Satellite Operators Association (“ESOA”),³ and collectively, the “Satellite Trade Associations”) hereby provide these comments in the above referenced proceeding.⁴ The Satellite Trade Associations fully support the important goals of the Federal Communications Commission (“FCC”) on protecting the security of America’s communications networks against threats related to the supply chain.

The Satellite Trade Associations have been at the forefront of the communications industry’s efforts to ensure that satellite communications networks are protected against cyber security threats. For example, members of the satellite industry have been at the forefront of

¹ **SIA** is a Washington D.C. based trade association representing the leading global satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. Since 1995, SIA has been the unified voice of the satellite industry on policy, regulatory, and legislative issues affecting the commercial satellite industry. The association actively promotes the benefits and uses of commercial satellite technology and its role in national security, homeland security, disaster relief and recovery, and the global information infrastructure and economy. These comments are supported by all SIA members except for AT&T Services, Inc. which abstain from participation.

² **GVF** is the single and unified voice of the global satellite industry. Founded in 1997, it brings together organisations engaged in the delivery of advanced broadband and narrowband satellite services to consumers, and commercial and government enterprises worldwide. Headquartered in London, GVF is an independent, non-partisan and non-profit organisation members from every region of the world.

³ **ESOA** is the world’s only CEO-driven satellite association and leads a coordinated and impactful response to the global challenges and opportunities the commercial satellite communications sector faces. Established as a non-profit organization, ESOA has as its objective to promote the common interests of satellite operators. Today ESOA represents the interests of EMEA satellite operators who deliver information communication services across the globe.

⁴ *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, Notice of Proposed Rulemaking, FCC 18-42 (2018) (“*Supply Chain NPRM*”).



such efforts as the FCC's 2015 Communications Security, Reliability, and Interoperability Council ("CSRIC") where best practices for the cyber security of communications network were adopted and agreed to by members of the satellite industry.

The Satellite Trade Associations have also actively developed and adopted best practices on cyber security.⁵ With the increasing threat to the nation's communications networks supply chain, the Satellite Trade Associations have recently updated these best practices to specifically address the threat to the nation's supply chain.⁶ This reflects the full commitment of the communications satellite industry to ensure a reliable and protected satellite communications infrastructure.

As the Satellite Industry Trade Association's successful efforts at developing industry-wide best practices demonstrates, collaboration, not regulation, is the best way to manage cyber risks. Accordingly, the Satellite Trade Associations urge the FCC to consider the important role that best practices, such as the Joint Statement of the Satellite Industry's Commitment to Cyber Security, is it considers the role of regulation in protecting the nation's communications network supply chain.

Respectfully submitted,

Aarti Holla
Secretary General
ESOA

David Hartshorn
Secretary General
GVF

Tom Stroup
President
SIA

⁵ *Joint Statement on the Satellite Industry's Commitment to Cybersecurity*, available at <https://gvf.org/images/pdf/SIAGVFESOAcybersecMay2018.pdf>.

⁶ *Ibid.*