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July 2, 2019

VIA ELECTRONIC FILING

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

Re: *Notice of Ex Parte Meeting*, GN Docket No. 18-122

Dear Ms. Dortch:

Per FCC Rule 1.1206, this letter provides notice that on June 28, 2019, Peter Pitsch, Executive Vice President, Advocacy & Government Relations, C-Band Alliance (“CBA”); Susan Crandall, Associate General Counsel, Intelsat US LLC; Steve Corda, Vice President Media Platforms, SES; Petra Vorwig, Senior Legal & Regulatory Counsel, SES Americom, Inc.; and Jennifer Hindin, Henry Gola and Kathryne Dickerson of Wiley Rein LLP, counsel to the CBA (collectively, the “CBA Participants”), met with the Commission personnel listed in Attachment A.

The CBA Participants noted that T-Mobile’s suggestion¹ that fiber can replace satellite as the backbone of U.S. content distribution—at least in some geographic areas—fails to address the full scope of the architecture that would be required to connect hundreds of content providers to over ten thousand earth stations. The fiber transition T-Mobile dreams up is, in fact, enormously complex, would lack the reliability of C-band satellite distribution, and would take a decade or more to complete, costing the U.S. economy tens of billions of dollars.²

Mr. Corda described the full nature of the complex architecture that would be required in order to utilize fiber to distribute content to earth stations.³ As described in more detail in Attachment B, the amount of time required to simply design and plan for the implementation of such a network could take over 24 months. The actual buildout and testing would take even longer, and would require satellite operations to continue in C-band frequencies during the entire transition period to ensure existing services are not disrupted.

¹ Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile USA, Inc., GN Dkt. No. 18-122 (June 21, 2019) (attaching study by Roberson and Associates LLC).

² See *Maximizing the Value of the C-Band*, Coleman Bazelon, the Brattle Group, at 27 (Oct. 29, 2018) (filed as Attachment to Joint Comments of Intel Corporation, Intelsat License LLC, and SES Americom, Inc., GN Docket No. 18-122 (Oct. 29, 2018)).

³ See Attachment B.

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Mr. Corda also explained that fiber does not come close to matching the reliability that content distribution companies and American consumers demand. To achieve anything close to such reliability, the costs associated with the installation, operation, and maintenance of T-Mobile's imagined fiber networks would skyrocket. As such, while T-Mobile has provided the Commission with information about the cost of running fiber to each C-band receiving earth station in the United States, it vastly underestimates the costs involved in operating and maintaining fiber distribution systems.

The CBA Participants reiterated that if the Commission is committed to the twin goals of quickly reallocating spectrum to terrestrial 5G operators while ensuring that existing C-band satellite services continue with the same quality of service customers enjoy today, T-Mobile's fiber proposal is not the answer.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

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

Attachments

ATTACHMENT A

FCC Personnel:

Jose Albuquerque
Kenneth Baker
Greg Callaghan
Peter Daronco (via phone)
Patrick DeGraba
Anna Gentry (via phone)
Jennifer Gilsen
Aaron Goldberger
Michael Ha
Julie Knapp
Evan Kwerel
Paul LaFontaine
Giulia McHenry
Kerry Murray
Roger Noel
Robert Pavlak
Matthew Pearl
Paul Powell
Jim Schlichting
Blaise Scinto (via phone)
Donald Stockdale
Jeffrey Tignor (via phone)

ATTACHMENT B

(The Challenges of Replacing C-Band Satellite with Fiber)