

July 15, 2019

VIA ELECTRONIC FILING

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

Re: Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band, GN Docket No. 18-122
Ex Parte Letter

Dear Ms. Dortch:

Globecast America, Inc (“Globecast”) writes to express concern with respect to recent filings suggesting that fiber is an adequate substitute for C-band cable and broadcast content distribution.¹ Globecast agrees with the recent *ex parte* submission of a group of content companies that “[n]o other distribution method matches the C-band in ubiquity and reliability” and that C-band is “*the* principal means of delivering video to the many thousands of earth stations in the United States.”² Current fiber deployments are not nearly extensive enough to replace nationwide C-band coverage and lack the C-band’s reliability and resiliency. Moreover, based on our experience, there is simply no evidence to indicate that fiber build-out could be achieved in the 18-month timeframe alleged in recent filings.

Even where fiber is available, it is vastly more expensive than C-band satellite service. Contrary to their recent filing, ACA has affirmed that “in rural and less dense areas[,] . . . delivery of video feeds by fiber would be extremely expensive if not impossible.”³ Yet these fiber proposals largely fail to acknowledge the increased operating costs to media service providers like Globecast, which rely on multiple C-band satellites spread throughout the full domestic are and all available frequencies to serve their customers. Moreover, building fiber out with the redundancy that could come closer to, but would still not achieve, the reliability cable and broadcast video programming distributors expect is likely a decade-long process and it is not clear to us who would be responsible for managing that process. Fiber diversity/redundancy is quite complicated, involving more than one conduit per site connected to different telco central offices. As a service provider that utilizes many technologies including fiber, satellite and the public internet, Globecast can state from experience that the reliability of single-thread (non-diverse) fiber is far inferior to that of satellite and is unacceptable for all broadcasters and programmers that rely on providing uninterrupted services to their subscribers and advertisers.

¹ ACA Connects, Competitive Carriers Association and Charter Communications, Ex Parte Letter, GN Dkt. No. 18-122 (July 2, 2019); 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 Letter from Matthew S. DelNero, Counsel for the Content Companies, GN Dkt. No. 18-122 (June 7, 2019) (emphasis in original).

³ Reply Comments of ACA, GN Dkt. No. 18-122, at 1 (Dec. 11, 2018).

Further, many questions remain: For example, who will be accountable for ensuring that the nationwide fiber roll out is accomplished in a coordinated timeframe? Will additional burdens be placed on programmers and broadcasters, such as filing progress reports with the FCC reporting on each of our urban distribution points? It appears to us that under the fiber proposals, our content would be riding on hundreds of point-to-point fiber connections instead of a single, integrated, and highly reliable C-Band solution.

It is critical to understand that a collection of single fiber links does not constitute a distribution network. The C-Band Alliance, in a recent filing, accurately raised the multitude of issues that must be addressed with respect to replacing C-band distribution with fiber distribution.⁴ By contrast, the C-Band Alliance proposal is the only plan on the record that will fully protect existing C-band customers while quickly making substantial C-band spectrum available for terrestrial 5G. Repurposing 200 MHz of spectrum is a sound approach because it will ensure that current customers can continue using the C-band to provide content distribution and other vital services to American consumers. Moreover, CBA members have committed publicly to launching new satellites to ensure that they have the same total on-orbit capacity to carry video and other services in 300 MHz of spectrum that they carry today with 500 MHz.⁵ And, importantly, the CBA has put on the record a contractual commitment regarding the ongoing availability and reliability of our networks.⁶ Who will be making that commitment in a fiber environment?

From the beginning of the FCC's inquiry, programmers and broadcasters have sought certainty regarding the operating environments for our businesses. Implementing a fiber solution will have vast implications for every single content owner and distributor in the United States and will take time to complete, which will further disrupt our business.

⁴ Letter from Jennifer D. Hindin, Counsel for the C-Band Alliance, Attachment B, *The Challenges of Replacing C-Band Satellite with Fiber*, GN Dkt. No. 18-222 (July 2, 2019).

⁵ See, e.g., Letter from Jennifer D. Hindin, Counsel for the C-Band Alliance, GN Dkt. No. 18-122 (Feb. 7, 2019).

⁶ Letter from Henry Gola, Counsel for the C-Band Alliance, GN Dkt. No. 18-122 (Apr. 3, 2019).

Because it is the only plan that provides incumbent C-band customers like us with an operationally efficient environment that leverages satellite's unmatched capability to broadcast nationwide, while quickly freeing-up spectrum for terrestrial 5G, Globecast endorses the C-Band Alliance proposal and urges the Commission to adopt it expeditiously.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'E. Ferraro', is written over a horizontal line.

Eddie Ferraro
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