

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Petition for Rulemaking to Amend and Modernize)	
Parts 25 and 101 of the Commission's Rules to)	RM-11791
Authorize and Facilitate the Deployment of Licensed)	
Point-to-Multipoint Fixed Wireless Broadband)	
Service in the 3700-4200 MHz Band)	

OPPOSITION OF SES AMERICOM, INC.

SES Americom, Inc. ("SES") joins the Satellite Industry Association ("SIA")¹ in opposing the above-captioned Broadband Access Coalition ("BAC") petition for rulemaking, which asks the Commission to abandon its well-established and operationally essential policy of licensing fixed-satellite service ("FSS") earth stations for the full band and full arc in the 3700-4200 MHz C-band downlink spectrum.²

As SIA explains, the changes requested by the BAC represent a "lose-lose" proposition.³ The proposals would undermine FSS operators' ability to continue providing extremely reliable satellite services that play an important role in the nation's telecommunications infrastructure, including serving as the only source of connectivity in remote and rural areas.⁴ Despite the BAC's claim that both existing and future FSS operations would be protected from harmful interference, the BAC has not put forth even the outlines of a plan to accomplish that goal.⁵

¹ Opposition of the Satellite Industry Association, RM-11791, filed Aug. 7, 2017 ("SIA Opposition").

² Petition for Rulemaking, Broadband Access Coalition, RM-11791, filed June 21, 2017 ("BAC Petition").

³ SIA Opposition at ii.

⁴ *Id.* at 4-9.

⁵ *Id.* at 13-15.

Moreover, any claimed benefits of the BAC Petition are highly speculative.⁶ In short, the BAC Petition's approach would sacrifice crucial existing satellite services with no realistic prospect of expanding terrestrial operations in areas where they are lacking today.

SES writes separately here to highlight its own experience as a space station and earth station operator with the critical need for flexibility provided by full-band, full-arc earth station licensing. SES's AMC-9 satellite, which had been providing C- and Ku-band service from 83° W.L., recently suffered a completely unexpected anomaly that resulted in the interruption of service to customers relying on that spacecraft. Following the anomaly, SES immediately began implementing a series of steps to provide customers that had been using AMC-9 with capacity on other satellites at other orbital locations, using complex procedures that prioritized customers based on the level of protection they had purchased.

The ability of SES's customers to repoint antennas and shift frequencies to those available on other C-band spacecraft was essential to implementation of SES's restoration plans. Even with that flexibility, the process of changing satellites was complicated and time-consuming. For example, one U.S. customer used AMC-9 to distribute video programming to more than one hundred affiliates nationwide. Once capacity for that customer was located on a different SES satellite, the network operator and each of those affiliates needed to repoint their antennas toward that satellite. Because the anomaly occurred over a weekend (early on a Saturday morning), it took time for the affiliates to dispatch qualified staff to each antenna site in order to perform the necessary realignment.

These delays in restoration were unavoidable consequences of the anomaly, but absent full-band, full-arc licensing, restoration would likely have been completely impossible, and at a

⁶ *Id.* at 9-13.

minimum would have taken much, much longer. Without full-band, full-arc licensing, each of the one hundred-plus affiliates that had been using AMC-9 would have needed to determine whether it could feasibly switch to the replacement transponder designated by SES, requiring it to ascertain whether a terrestrial service had been deployed in that transponder's frequencies that would create interference to the repointed earth station. In the extremely remote event that none of the affiliates had an issue with spectrum availability with the necessary repointing, each of the affiliates would have needed to seek Commission authority to make the change. Commission staff would have been flooded with dozens of applications for modified authority and as many requests for special temporary authority pending action on the underlying modifications. All this would have happened over a weekend, when neither frequency coordination firms nor the Commission would be staffed to handle the influx.

The BAC Petition admits that there should be a mechanism for FSS earth stations to change "the frequency or orbital slot of their communications" if "such a change is necessary."⁷ Presumably the unexpected failure of a satellite would qualify as making a change "necessary." But the BAC Petition does not attempt to suggest how even a change deemed necessary could be implemented if earth station licensees did not have the flexibility conferred by full-band, full-arc licensing.

⁷ BAC Petition at 26.

Because the proposals in the BAC Petition would threaten the satellite industry's ability to provide reliable service to customers without creating any countervailing benefits, the Commission should reject the changes sought by the BAC.

Respectfully submitted,

SES AMERICOM, INC.

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August, 2017, I caused a true copy of the foregoing “Opposition of SES Americom, Inc.” to be sent by first class mail, postage prepaid, to the following:

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/s/ Norma Herrera
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