August 13, 2020

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

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

Dear Ms. Dortch:

The recent announcement to reallocate an additional 100 megahertz of spectrum for U.S. commercial mobile services in the 3.45-3.55 GHz band is a welcome development in the race to 5G. But the C-band remains a critical element of the U.S. plan to free more mid-band spectrum for the next generation of mobile connectivity. It is the largest swath of mid-band spectrum that is likely to be reallocated to support 5G for many years. The Commission should do everything in its power to complete the C-band auction and the transition as planned and on time, and not disturb the careful balancing and consideration it went through in adopting the C-band Order.

The Commission carefully constructed the C-band Order to ensure a smooth transition to clear spectrum for flexible use licensees, including, importantly, relocating incumbent operations while maintaining at least the same level of service for their customers. Now, instead of focusing on the complex and crucial task at hand, Intelsat and others are re-litigating issues already thoroughly considered and decided by the Commission. In particular, despite being in line to collect relocation payments for agreeing to move operations on an accelerated timeline, Intelsat now requests changes that would slow the transition process and could ultimately affect 5G deployment. The Commission should deny these requests and remind Intelsat of its obligations to ensure a timely transition of its operations.

Of critical importance, Telemetry, Tracking, and Command (“TT&C”)/Gateway sites must be consolidated to the four locations selected by the satellite operators in the manner and timeframe set out by the Commission. As T-Mobile points out, operations at these consolidated

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3 See C-band Order at ¶ 232.
4 Petition of Intelsat License LLC for Reconsideration, GN Docket No. 18-122, at 2-7 (May 26, 2020) (“Intelsat Petition”).
5 C-band Order at ¶¶ 373-389.
sites will enjoy significant protections for the next decade. But Intelsat’s requests to skirt the Commission’s rules threaten to derail the transition and delay access to mid-band spectrum critically needed for terrestrial mobile services.

First, Intelsat asks the Commission to reconsider protected use of the full 500 megahertz of C-band spectrum for international gateway operations at the consolidated TT&C/Gateway sites. The Commission provides protection for TT&C operations through December 5, 2030 at the four consolidated TT&C sites, but it rightly rejected calls for international gateway operations to be protected. Instead, it allows these operations to continue on an unprotected basis to preserve the ability for terrestrial mobile services in the area. Intelsat provides no new arguments meriting reconsideration of that decision.

Next, Intelsat argues that if the Commission will not afford protection for the use of the full 500 megahertz of C-band at the consolidated TT&C/Gateway sites, then it should adopt new filtering criteria and a 20 MHz guard band around these sites. These would be unnecessary new requirements added to a settled issue that the Commission resolved when it set out the parameters for TT&C/Gateway sites.

The Commission found that there was no need for these types of drastic adjustments, which would be inconsistent with the goal of freeing C-band for 5G deployment in all corners of the country. Eutelsat and terrestrial mobile operators agree that these requested changes could have negative consequences on terrestrial buildout – undermining the very reason for the

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6 Letter from Steve B. Sharkey, T-Mobile, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122, at 2 (filed July 28, 2020) (“T-Mobile Ex Parte”); see also, C-band Order at ¶ 376.
8 See Intelsat Petition at 5-7.
9 C-band Order at ¶ 376.
10 Id. at ¶ 380 (“Extending interference protection to these operations, as requested by SES and C-band Alliance, could effectively preclude terrestrial operations across a wide geographic area near each TT&C facility across the entire 3.7-4.0 GHz band. This outcome would be inconsistent with the Commission’s goals for this proceeding and the transition plan detailed herein.”).
11 Id. at ¶¶ 379-380.
12 Intelsat Petition at 8-11.
13 C-band Order at ¶¶ 373-389.
14 Id. at ¶ 380.
Commission’s work in this proceeding and undercutting the work to ensure continued 5G leadership globally. 15

Finally, Intelsat asks the Commission to delay the deadline for relocating TT&C/Gateway operations by two full years, from December 2021 to December 2023. 16 This unnecessary delay will affect network planning for new 5G services and slow the C-band transition. The December 2021 deadline adopted by the Commission provides sufficient time for TT&C operations to be relocated and new terrestrial mobile licensees are depending on the C-band transition moving forward as planned. The Commission has already fully considered these issues and provided avenues for a change in timing for some TT&C sites without affecting the entire transition. 17 The Commission should avoid any delay in the considered and interdependent timeline for repurposing this critical band for 5G, and thus should reject Intelsat’s untimely request. 18

Reallocating C-band spectrum is critical to U.S. leadership in 5G. Intelsat’s requests regarding TT&C/Gateway operations are unnecessary, and would be contrary to the public interest and the Commission’s commitment to freeing C-band spectrum for 5G services as quickly as possible. The Commission already settled these issues; Intelsat’s requests should be promptly denied.

Sincerely,

cc: (by email)
Susan Crandall
Laura Phillips

16 Intelsat Petition at 20-22.
17 C-band Order at ¶ 375 (“We may allow existing TT&C operations to continue in their current location beyond the December 5, 2021 deadline either through a waiver request upon a sufficient showing to the International Bureau or through negotiated agreements with affected 3.7 GHz Service licensees.”).
18 See Verizon Opposition to Petitions for Reconsideration, GN Docket No. 18-122 at 7 (June 26, 2020).