

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 SATELITES MEXICANOS, S.A. DE C.V. (d/b/a Eutelsat Americas)**

Satelites Mexicanos, S.A. de C.V. (“Eutelsat Americas”) also joins the Satellite Industry Association (“SIA”)<sup>1</sup> and other satellite operators, such as SES Americom, Inc. and Intelsat License LLC<sup>2</sup>, 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.<sup>3</sup>

For standing purposes to take a position in this proceeding, Eutelsat Americas provides services in the United States on a satellite fleet, as a result of market access approvals currently held.<sup>4</sup>

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<sup>1</sup> Opposition of the Satellite Industry Association, RM-11791, filed Aug. 7, 2017 (“SIA Opposition”).

<sup>2</sup> Opposition of Intelsat License LLC RM-11791, filed Aug. 7, 2017

<sup>3</sup> Petition for Rulemaking, Broadband Access Coalition, RM-11791, filed June 21, 2017 (“BAC Petition”).

<sup>4</sup> Eutelsat 113 West A (call sign S2695), Eutelsat 115 West B (call sign S2938), Eutelsat 117 West A (call sign S2873) and Eutelsat 117 West B (call sign S2926)

As SIA explains, the changes requested by the BAC represent a “lose-lose” proposition.<sup>5</sup> 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.<sup>6</sup> 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.<sup>7</sup>

Eutelsat Americas writes separately here to encourage the Commission to reject the BAC Petition’s request for revision of the full-band, full-arc earth station licensing policy.

Respectfully submitted,

**Satelites Mexicanos, S.A. de C.V. (d/b/a Eutelsat Americas)**

By: /s/ Hector Fortis  
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August 22<sup>nd</sup>, 2017

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<sup>5</sup> SIA Opposition at ii.

<sup>6</sup> *Id.* at 4-9.

<sup>7</sup> Opposition of SES Americom, Inc. RM-11791, filed Aug. 7, 2017 at 2

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of August, 2017, I caused a true copy of the foregoing “Opposition of Satelites Mexicanos, S.A. de C.V. (d/b/a Eutelsat Americas)” to be sent by first class mail, postage prepaid, upon the following:

Broadband Access Coalition  
c/o Robert S. Koppel  
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Suite 1200  
Tysons, VA 22102

/s/  
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Carlos Flores