

September 9, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch,

On September 5, 2019, representatives of PSSI Global Services, L.L.C. (“PSSI”) met at the Commission with Julius Knapp, Ira Keltz, Barbara Pavon, Bahman Badipour and Michael Ha of the Office of Engineering & Technology; Jim Schlichting of the International Bureau; Patrick DeGraba of the Office of Economics and Analytics; and Kenneth Baker, Tom Derenge and Paul Powell of the Wireless Telecommunications Bureau regarding the company’s concerns prompted by the proposed changes to the C-band. Robert Lamb, CEO and Manager of PSSI, its strategic consultant, Peter Engel of WellsWentworth, and I attended on behalf of PSSI.

Mr. Lamb gave a comprehensive overview of PSSI and its operations, its role as the major mobile transportable solutions company in the C-band and the dependence of programming origination, production and distribution on the continued availability of robust, full-band/full-arc licensing policies. The C-band is not only necessary for PSSI and its customers because of its preferred transmission reliability and quality in inclement weather (particularly necessary when insuring high valued pay-per-view and other major event transmissions), but also because of the preferred characteristics of C-band for multi-path high efficiency transmissions. He discussed PSSI’s recent technical accomplishments, including an Emmy awarded to PSSI for 28-path production C-band multipath transmission services in support of NASCAR. More recently, PSSI has been able to do an even more robust 31-path production, but that this level of technical capability depended the special and unique characteristics of C-band, as well as upon availability of enough C-band spectrum over the entire 500 MHz of the C-band spectrum to continue to provide and improve production event transmission capabilities.

PSSI explained the ongoing concerns about the 5G in-band and out-of-band power levels that pose a critical threat to PSSI’s C-band transportable operations and how proposed filtering solutions may also impact transportable licensees like PSSI. It was noted that the C-band Alliance (“CBA”) and PSSI believed that filters being developed would protect fixed location FSS licensees after the repurposing of the C-band. However, PSSI noted that although those solutions would appear to protect fixed locations, they would not solve the problem of interference to transportable operators. Mr. Lamb pointed out that transportable operators routinely encounter other unexpected interference. PSSI conducted tests with CBA in late August at PSSI’s Orlando, Florida location and offered that PSSI would report to the Commission regarding the results.

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Pursuant to Section 1.1206(b)(2) of the Commission's Rules, an electronic copy of this letter is being filed in the above-referenced docket, with copies to the Commission participants. Please direct any questions regarding this filing to me at stephen.diaz.gavin@rimonlaw.com or at 202-871-3772.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen Diaz Gavin", enclosed within a thin black rectangular border.

Stephen Díaz Gavin

cc: Julius Knapp
Patrick DeGraba
Kenneth Baker
Tom Derenge
Jim Schlichting
Ira Keltz
Barbara Pavon
Bahman Badipour
Michael Ha
Paul Powell (via telephone)