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VIA ELECTRONIC FILING

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

Re: *Notice of Ex Parte Meeting*, GN Docket No. 18-122

Dear Ms. Dortch,

Per FCC Rule 1.1206, this letter provides notice that on September 16, 2019, Peter Pitsch, Executive Vice President, Advocacy & Government Relations, C-Band Alliance (“CBA”); Susan Crandall, Associate General Counsel, Intelsat US LLC; Steve Corda, Vice President Media Platforms, SES Americom, Inc.; and Jennifer Hindin, Henry Gola, and Kathryne Dickerson of Wiley Rein LLP, counsel to the CBA, met with the Commission personnel listed in Attachment A.

During the meeting, the participants discussed the CBA’s proposal to clear a portion of the C-band for terrestrial 5G use via a market-based mechanism. In response to concerns on the record regarding 5G interference to transportable C-band antennas,¹ Mr. Corda discussed a proposal that the CBA has developed to protect such antennas.²

Specifically, the CBA proposes that the FCC, working with relevant stakeholders, develop a list of venues where transportable antennas are likely to be deployed. Such venues would include, for example, football and other sports stadiums/arenas, golf courses, and music/event venues. Based on conversations with industry, the CBA estimates that this list may include approximately 500-700 venues.³ Transportable antenna operators would then identify specific locations—defined by latitude and longitude—where transportable equipment is likely to be located at those venues. For example, the parking lot location(s) where satellite trucks typically park during football games would be identified. Those locations would then be registered in the FCC’s IBFS database as though a “traditional” FSS earth station were located there. Once registered, 5G operators would be required to protect transportable “venue earth stations” for full CONUS arc services when designing and deploying their networks just as they would

¹ See, e.g., Further Supplemental Comments of PSSI Global, GN Dkt. No. 18-122 (filed Aug. 7, 2019).

² It is worth noting that 5G interference to transportable antennas is not an issue unique to the CBA’s proposal.

³ For venues built after the list is finalized, an operator wishing to deploy a transportable antenna could petition the FCC to allow registration of a new “venue earth station,” which may require coordination among the petitioner and 5G operators before grant.

“traditional” FSS earth stations.⁴ This approach will ensure that transportable antennas are able to continue providing C-band service to many venue-based events while allowing 5G operators to efficiently design and deploy their networks.⁵

Also at the meeting, Mr. Corda stated that the CBA supports Verizon’s interference management proposal.⁶ Specifically, the CBA supports Verizon’s approach of “plac[ing] the burden of interference management on the [wireless] operator, not on the equipment.”⁷ The CBA believes that there are many tools available to operators to effectuate interference management including, for example, multi-beam BS antenna, MIMO antenna arrays, and micro cells. In contrast, focusing on base station or user equipment could slow 5G innovation or result in a failure by 5G to reach its full technical promise. The CBA further agrees with Verizon that C/N may be a reasonable proxy for detecting interference from out of band emissions.⁸ Use of C/N as a proxy should be accompanied by the CBA proposal that would apportion aggregate emissions among the wireless licensees within proximity to the earth station experiencing interference.⁹ Additionally, the CBA supports Verizon’s proposed Joint Rapid Response Clearinghouse¹⁰ as a proactive interference mitigation approach and agrees that TT&C/Gateway locations should be sited so as not to impact major population centers.¹¹ The CBA is, in fact, in the process of selecting no more than four TT&C/Gateway sites that will not impact major population centers.

⁴ Although the exact location of a transportable antenna at a given venue may vary from time-to-time, existing rules already provide sufficient flexibility to account for these variations. Section 25.118 of the FCC’s rules allows earth station operators to move antennas operating in shared bands up to one arc second in latitude or longitude (*i.e.*, 30 meters in latitude and 20-28 meters in longitude depending upon the location in CONUS) from the originally authorized earth station coordinates without obtaining a new authorization. 47 C.F.R. § 25.118. The CBA proposes that 5G operators be required to design and deploy their networks to account for this rule, which in turn will provide flexibility to transportable antenna operators.

⁵ The majority of C-band transportable antennas are used for contribution feeds for sports and other live-televised, scheduled events. Other transportable antennas, such as those deployed to the scene of a fast-breaking news story, generally rely on the Ku-band.

⁶ See *Protecting C-Band Earth Stations, An Alternative Approach*, filed as attachment to letter from William H. Johnson, Senior Vice President, Federal Regulatory and Legal Affairs, Verizon, to Marlene H. Dortch, Secretary, FCC (filed Sept. 16, 2019) (“*Protecting C-Band Earth Stations*”).

⁷ *Id.*, pg. 2.

⁸ *Id.*, pg. 11.

⁹ *Technical Annex, 5G In-Band and Out-Of-Band Limits and Protection of FSS Earth Stations*, filed as attachment to Reply Comments of the C-Band Alliance, GN Dkt. No. 18-122 (filed Dec. 7, 2018).

¹⁰ *Protecting C-Band Earth Stations.*, pg. 13.

¹¹ *Id.*, pg. 14.

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Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

/s/ Jennifer Hindin

Jennifer Hindin

Counsel for the C-Band Alliance

ATTACHMENT A

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