

**DAWNco**Reasonable prices, priceless reasoning.

September 25, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St 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:

As President of DAWNco, a leading provider of satellite downlink equipment and services, I urge the Commission to ensure that any reallocation of C band spectrum for 5G carries with it sufficient protections for existing C band users. In that regard, I oppose the C-Band Alliance ("CBA") proposal that satellite companies assume control over the process of repacking and installing filters on thousands of C band earth stations across the country. In my experience, C band users demand the flexibility to procure equipment that meets their needs and to manage access to their own earth station facilities. The CBA's proposal would place too much control in the hands of the satellite industry, while providing no incentive for them to get the job done properly. We also do not believe they could complete the transition within the 18-36 month timetable they have projected. In place of the cumbersome, centralized approach that CBA proposes, the Commission should establish a decentralized process in which users are reimbursed for the costs of procuring and installing equipment of their choice.

DAWNco is a leading provider of satellite earth station equipment and services. We have established ourselves as an industry leader by sourcing high quality downlink products from the best manufacturers, and by helping customers choose the best equipment to maintain and expand their downlink systems. DAWNco has sold thousands of C band bandpass filters and is extensively familiar with this market.

In DAWNco's view, the CBA transition plan for C band earth stations is fundamentally flawed. Under the CBA's plan, a consortium of satellite companies would be charged with managing the transition for thousands of earth stations nationwide and making every key decision about equipment, personnel, and timing. The CBA appears to vastly underestimate the scale and complexity of this task, and the amount of time needed to get it done. There is no way to automate or routinize the process of transitioning these thousands of C band earth stations. The circumstances of each C band earth station will vary, sometimes considerably, and each station's transition will require individualized attention and care to ensure the job is done properly. If no equipment can be purchased or work performed on any earth station until the CBA consortium weighs in, the result will be chronic delays and complications that extend the transition well beyond 36 months. And of course, these delays will have cascading effects on the timeline for introducing 5G services in the band.

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What's more, the CBA plan carries significant risks that C band earth stations will be left vulnerable to interference from 5G signals after the transition. The CBA members have a strong incentive to minimize the costs of the transition by purchasing inexpensive, "one-size-fits-all" equipment and hiring inexperienced contractors at the lowest possible rates to perform the work. Under such an approach, there is no guarantee that each user will obtain high-quality equipment that is compatible with its downlink facilities, or that the installation of equipment and other work will be competently performed. Moreover, there is no recourse under the plan for earth station operators that discover interference problems months or years down the road, after 5G operations have ramped up.

For these reasons, DAWNco strongly opposes the CBA transition plan for C band earth stations. Notwithstanding what trade associations of C-band users may say, we are confident the plan would not be acceptable to our customers and others that operate C band downlink stations. In DAWNco's experience, conscientious downlink managers will not want to rely on an impersonal help desk, or installers they have never met, to climb up to their critical downlink dishes and make modifications. They will want a trusted vendor they can count on to provide a high level of service and accuracy in procuring the filters and other hardware they need. Most downlink users will want to use their own trusted staff engineers and technicians to install filters and re-peak dishes. Some will have a trusted local contract engineer that they regularly use to perform their satellite work, and may reasonably expect to use for work related to this transition. Earth station users may also wish to perform the necessary work at off-peak hours to minimize the risk of disruption to their services.

The CBA plan would deny earth station operators this necessary flexibility and control. Notably, there is an alternative C band proposal that offers a better model. The "5G Plus Plan" put forward by ACA Connects, Competitive Carriers Association, and Charter, would provide affected C band users the ability to purchase required equipment and services of their choice and then seek reimbursement from a transition fund. This is the right way to go. If C band satellite downlink users are required to modify or repack their facilities to allow 5G operations in the band, they must have the freedom to select products of their choice, employ trusted vendors, and manage access to their own facilities. The CBA approach, by contrast, is unacceptable and unworkable.

Sincerely,

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