

November 19, 2019

Via Electronic Filing

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

Re: *Ex parte* submission in GN Docket No. 18-122

Dear Ms. Dortch:

The undersigned companies and the National Association of Broadcasters – entities that represent some of the largest purchasers of C-Band capacity in the United States – are pleased to write today in support of Chairman Pai’s statement that any upcoming Order on the future of the C-Band will “protect the services that are currently delivered using the C-band so they can continue to be delivered to the American people.”¹ The Chairman’s recognition of the importance of maintaining a robust and reliable content distribution system in the upper 200 MHz of C-band spectrum, free of harmful interference and without proposals to introduce new terrestrial transmissions, whether on a fixed, mobile, or flexible use basis, is a critical step in this proceeding. We appreciate the Chairman’s commitment to protecting content distribution during and after the transition.

We also appreciate the thoughtfulness and diligence the Commission and staff have displayed in this proceeding as they continue to move as fast as responsibly possible to a framework that will provide additional spectrum for 5G uses while ensuring a sustainable future for C-Band content delivery. We are committed to working closely with the Commission, the satellite industry, and other stakeholders, to ensure a successful transition. We appreciate Chairman Pai’s commitment to protecting services delivered via the C-Band, including working to make the transition effective and workable for satellite operators and their customers, thus ensuring that services that rely on the C-band can be maintained and protected throughout the transition.

Clearing 300 MHz of spectrum from a 500 MHz-wide band that is intensively used for video and audio delivery will be an enormous undertaking. It will require the securing of commitments made during the record of this proceeding that will be indispensable to accommodate the shift to less spectrum while protecting services delivered via the C-Band during and after the transition. Thus, to be successful, this transition will require a high degree of cooperation from multiple interests, including in particular the satellite industry. Active participation by satellite operators, in conjunction with the companies that rely on C-band service, is the only way to protect the viewers and listeners that currently depend on the C-band. A successful transition will require

¹ Letter from Chairman Ajit Pai to the Hon. John N. Kennedy (Nov. 18, 2019) available at: <https://docs.fcc.gov/public/attachments/DOC-360855A14.pdf>.

careful planning, testing, oversight, and cooperation among the satellite companies, customers, distributors, mobile providers, and other stakeholders. We also appreciate that there will be an active and ongoing oversight and enforcement role by the Commission.

As we have stated in previous filings, details of the rules that will govern matters such as the transition process; reimbursement of all costs associated with the transition, including but not limited to the costs of launching new satellites needed to preserve service going forward and costs associated with upgrading compression and modulation technologies to enable operation in reduced bandwidth; interference prevention, detection, mitigation and enforcement; maintenance of service during the transition including through dual illumination where necessary; and honoring of the commitments that the C-Band satellite companies have made in this proceeding (to name just a few), are essential.

The undersigned parties look forward to continuing to engage in good faith with the Commission, the satellite industry, and the wireless industry on these and other important matters.

Respectfully submitted,

/s/

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Ms. Marlene H. Dortch
November 19, 2019
Page 3

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