



November 26, 2019

VIA ELECTRONIC FILING

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

RE: Facilitating Communications of ESIMs with NGSOs, IB Docket No. 18-315

Dear Ms. Dortch:

Kuiper Systems LLC, a wholly-owned subsidiary of Amazon.com Services, Inc. (collectively, “Amazon”), supports prompt adoption of proposals in the Federal Communications Commission’s (“FCC” or “Commission”) *Notice of Proposed Rulemaking* to facilitate continued deployment of Earth Stations in Motion (“ESIMs”) communicating with non-geostationary satellite orbit (“NGSO”) Fixed-Satellite Service (“FSS”) systems.¹ The Commission has correctly recognized that the proposed rule changes will “promote innovative and flexible use of satellite technology, as well as regulatory equity between [geostationary satellite orbit (“GSO”)] and NGSO FSS systems.”²

Adoption of the proposals in the *Notice of Proposed Rulemaking* would facilitate Amazon’s provision of advanced communications services, including high-speed, low-latency broadband services to customers on mobile platforms through its proposed NGSO FSS satellite system (the “Kuiper System”).³ Amazon’s Kuiper System will deliver reliable broadband connectivity to tens of millions of customers worldwide, helping meet demand in unserved and underserved areas. This includes meeting the growing demand for broadband connectivity to aircraft, maritime vessels, and land vehicles. The FCC’s proposed rule changes would further Amazon’s use of Ka-band frequencies to serve customers, even while in transit.

Adopting the proposed rules would also create regulatory parity between GSO and NGSO systems communicating with ESIMs. Last year the FCC modified its rules to facilitate

¹ *Facilitating the Communications of Earth Stations in Motion with Non-Geostationary Orbit Space Stations*, Notice of Proposed Rulemaking, 33 FCC Rcd 11416 (2018) (“*Notice of Proposed Rulemaking*”).

² *Id.* ¶ 1.

³ See Application of Kuiper Systems LLC for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in Ka-band Frequencies, Call Sign S3051, IBFS File No. SAT-LOA-20190704-00057 (filed July 4, 2019).

communications of ESIMs with GSO systems.⁴ Streamlining the NGSO ESIM rules is the logical next step and would create an equitable regulatory framework for GSO and NGSO system operators.

The 2019 World Radiocommunication Conference (WRC-19) included an item on the agenda of WRC-23 on the use of the frequency bands 17.7-18.6 GHz, 18.8-19.3 GHz, and 19.7-20.2 GHz (space-to-Earth) and 27.5-29.1 GHz and 29.5-30 GHz (Earth-to-space) by earth stations in motion communicating with NGSO FSS space stations.⁵ Developing and adopting the proposed rule changes would enable continued U.S. leadership on the use of ESIMs at WRC-23.

To enable expanded deployment of mobile broadband connectivity and promote regulatory equity between GSO and NGSO systems, the Commission should adopt the proposed rule changes enabling ESIMs to communicate with NGSO systems in the proposed Ka-band frequencies.

Sincerely,

/s/ Mariah Dodson Shuman

Mariah Dodson Shuman
Corporate Counsel, Project Kuiper
Kuiper Systems LLC,
an Amazon subsidiary

⁴ *Amendment of Parts 2 and 25 of the Commission's Rules to Facilitate the Use of Earth Stations in Motion Communicating with Geostationary Orbit Space Stations in Frequency Bands Allocated to the Fixed-Satellite Service*, Report and Order and Further Notice of Proposed Rulemaking, 33 FCC Rcd 9327 (2018).

⁵ International Telecommunication Union WRC-19, Resolutions COM6/1 (WRC-19), COM6/13 (WRC-19) (2019), <https://www.itu.int/md/R16-WRC19-C-0554/en> (stating WRC-23 will consider this topic as Agenda Item 1.16).