Before the **FEDERAL COMMUNICATIONS COMMISSION**Washington, D.C. 20554

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| In the Matter of  Expanding Flexible Use of the 3.7 to 4.2 GHz Band  Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz  Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission’s Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3.7-4.2 GHz Band  Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Band Shared Between the Fixed Service and the Fixed Satellite Service | **)**  )  )  )  )  )  )  )  )  )  )  )  )  )  )  )  ) | GN Docket No. 18-122  GN Docket No. 17-183  (Inquiry Terminated as to 3.7-4.2 GHz)  RM-11791  RM-11778 |

**REPLY COMMENTS OF MICROSPACE COMMUNICATIONS CORPORATION**

Microspace Communications Corporation (“Microspace”) submits these reply comments in response to the above-captioned Notice of Proposed Rulemaking (“NPRM”) in which the Federal Communications Commission solicits feedback on proposals to permit terrestrial mobile use of the 3700-4200 MHz band (the “C-band”).[[1]](#footnote-1) We have three primary goals in submitting these comments: (1) make perfectly clear that the C-band content distribution services provided by satellite operators are essential to our business; (2) support the market-based approach of Intelsat License LLC, SES Americom, Inc., and Intel Corporation proposed in the NPRM to allow terrestrial mobile use of the C-band;[[2]](#footnote-2) and (3) oppose new fixed point-to-multipoint (“P2MP”) services in the C-band and associated proposed limits on full-band, full-arc protection for satellite earth stations.

Microspace currently distributes audio programming to approximately 2,935 C-band receive earth stations in all 50 states and parts of the Caribbean, specifically for radio broadcasting. Ongoing access to adequate C-band satellite spectrum and protection from interference is critical to Microspace and its customers, including Salem Radio Network, Salem Music Network, Moody Radio, VCY America, Christian Broadcasting System, Point of View, Immaculate Heart Radio and Relevant Radio, and Ambassador Advertising which includes programming of Focus on the Family and dozens more ministries. It should be noted that many of our customers and their ministries are not-for profit organizations. The cost to transition to an alternate technology would create financial hardship in many cases. Additionally, many of the 2,935 C-band earth stations are located in rural areas with unreliable public internet connectivity.

The C-band forms the backbone of the infrastructure content companies use to supply consumers across the country with premium audio programming. Any change in the current C-band operating environment could negatively affect our business[[3]](#footnote-3) and the American consumers we serve. Without such spectrum and protections in place, the impact to our company and our customers could be the elimination of this radio programming genre. Furthermore, U.S. consumers could be deprived of their constitutional rights, as most of this audio programming is religiously focused.

C-band offers reliability, quality, and cost efficiency that cannot be matched by other technologies or in other satellite spectrum. It is vital for continued high quality delivery of radio station content, as there is no alternative transmission mechanism that matches the reliability and reach of C-band satellites. Switching away from C-band satellites would also strand the investment Microspace Communications Corporation and our customers have made in the ground stations used for content distribution.

Moreover, the record suggests that co-frequency sharing between terrestrial mobile services and satellite operations is not feasible. As the NPRM recognizes, because signals from satellites are very weak when they reach the ground, terrestrial mobile operations could cause harmful interference to earth stations over large distances.[[4]](#footnote-4) Any risk of interference to the C-band satellite services on which Microspace relies is unacceptable, not only from a business revenue perspective, but because it jeopardizes the ability of American consumers to receive the programming content they want and upon which they rely.

The proper management of the future of the C-band is critical to the continued vitality of our business. Thus, we believe that a market-based approach, led by satellite operators, is the only practical solution for introducing terrestrial mobile operations in the C-band. Cable, systems, broadcasters and content delivery companies have been working with satellite operators for decades. We are their customers, and they understand our needs and have direct knowledge of our operations. Consequently, satellite operators are best positioned to protect our company and other incumbent users while also undertaking the arduous and costly task of clearing spectrum for terrestrial mobile use. We urge the Commission to move forward with the market-based solution discussed in the NPRM.[[5]](#footnote-5)

Finally, the Commission should not allow new P2MP services in the C-band or restrict the protection of C-band earth stations across the full spectrum band and the visible satellite arc.[[6]](#footnote-6) The flexibility to change frequencies and receive antenna orientations is essential to the value of the C-band satellite capacity on which Microspace and others rely. This flexibility allows restoration of service if an outage affects our primary space segment and facilitates the resolution of interference issues, as well as enabling us to take advantage of competition among satellite operators. The requirement to work around new P2MP facilities would undermine the nationwide reach of C-band service, and the requirement to modify earth station licenses for any change in operating parameters would impose significant and unjustified regulatory burdens. Microspace urges the Commission to focus on other spectrum that is not as intensely used as the C-band to meet any requirements for additional frequencies suitable for P2MP operations.

Respectfully submitted,

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|  | Microspace Communications Corporation  By: */s/* John H. Bimrose, Jr. *p*  Interim General Manager  MICROSPACE COMMUNICATIONS CORPORATION  3100 Highwoods Blvd, Suite 120  Raleigh, NC 27604 |

November 27, 2018

1. *Expanding Flexible Use of the 3.7-4.2 GHz Band*, Order and Notice of Proposed Rulemaking, GN Docket No. 18-122, FCC 18-91 (rel. July 13, 2018). [↑](#footnote-ref-1)
2. *See* NPRM ¶¶ 66-97. [↑](#footnote-ref-2)
3. Indeed, our industry has made substantial investments in C-band facilities to expand and update our distribution networks to ensure that all Americans have access to high quality content. [↑](#footnote-ref-3)
4. *See* NPRM ¶ 50. [↑](#footnote-ref-4)
5. *See* NPRM ¶¶ 66-97. [↑](#footnote-ref-5)
6. *See* NPRM ¶¶ 37-40 & 116-132. [↑](#footnote-ref-6)