



December 3, 2019

via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte

GN Docket No. 18-122 - *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*

Dear Ms. Dortch:

Vubiquity, Inc. (Vubiquity) is in the business of connecting content owners and video distributors so that they can deliver media to viewers on any screen. Vubiquity works with 600+ leading film studios, television networks, independent producers and digital first networks. Vubiquity is responsible for bringing premium content to over 1,000 global video distributors. As part of the services we offer, Vubiquity has developed a fiber network that provides both Multichannel Video Program Distributors (MVPDs) and Programmers with video delivery capability that meets carrier grade demands for quality and reliability, including a reliable fiber architecture, a managed video transport provider, security and programmable access, and other key aspects for the delivery of video programming over a fiber network. Vubiquity has operated this fiber distribution network for over seven years and has over 100 MVPDs and Programmers that are transporting programming over 350 Points of Presence (POPs) utilizing live linear channels.

Vubiquity is interested in providing assistance to its current customers and others that are seeking to transition from the C-Band pursuant to the process being undertaken by the Federal Communications Commission (FCC) in the above referenced docket. By this *ex parte* Vubiquity seeks to inform and educate the FCC, interested stakeholders and the general public of its capabilities. Vubiquity is uniquely positioned in this proceeding because it supports both our Programming and MVPD partners, including smaller cable systems and independent video programmers, that may have a long term need to cost effectively transition from the current C-Band to fiber delivery.

The Vubiquity fiber distribution network is a multicast based network utilizing private-fiber pairs between all POPs. All content is encrypted using 128-bit AES encryption. The network supports the receipt of programming feeds via both fiber ingest and satellite downlink. Equipment at each MVPD location is used to decrypt authorized signals for that specific MVPD and is used to implement blackout management per programmer requirements. The equipment at the MVPD outputs signals via multiple GigE or 10Gig

connections and can support hundreds of channels with just a few servers. Vubiquity enables MVPDs to connect to one or multiple POP locations and supports distribution over shared statewide networks (with Vubiquity controlling authorization/decryption at each individual headend). Vubiquity provides remote monitoring and support for all equipment with a spares pool for quick replacement if required. Vubiquity has a 24/7 staffed operations center that monitors the network, the video quality of all channels at multiple points in the network, and provides direct support to MVPDs.

The FCC is currently evaluating multiple approaches for increasing capacity on multiple satellites in order to free up C-Band spectrum for 5G services. Vubiquity believes that many MVPDs could benefit from receiving signals through the Vubiquity fiber distribution network in lieu of making changes at their headend to support new compressed satellite frequencies under consideration by the FCC. Receiving signals over the Vubiquity fiber distribution network would be a very simple cost effective transition enabling the MVPD to install just a few servers that provide an aggregated output in IP format as opposed to replacing hundreds of individual receivers and supporting a channel-by-channel migration as signals are moved across satellites to free up capacity. Use of the Vubiquity fiber network could assist in keeping transitioning costs low while providing a long term solution to migrating off of C-Band spectrum for those MVPDs looking for a long term fiber network distribution solution. MVPDs would be able to leverage available funds from the Commission to upgrade their network, and spend limited funds implementing IP connections to major POPs that would enable access to Vubiquity's feeds as well as enhanced Internet connectivity to support other applications on their networks at a significant cost reduction.

Vubiquity welcomes the opportunity to meet with the FCC to further discuss and develop the record in this proceeding in an effort to proactively derive a cost effective solution to the C-band transition.

Respectfully submitted,

Darcy Antonellis

Darcy Antonellis
CEO

Signature: *Darcy Antonellis*

Email: dantonellis@vubiquity.com

Title: CEO