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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 |

**COMMENTS OF LEARFIELD COMMUNICATIONS**

Learfield submits these 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.

Learfield operates via satellite nearly 30 Sports programming networks, 6 State-wide News and Information Networks, and the Brownfield Farm-Ag Network providing news and information to radio stations covering 13 states. Our Radio Network affiliate base is approximately 870 affiliate radio stations encompassing more than 27 states in the continental US.

Thus, the C-band satellite delivery platform forms the backbone of the infrastructure content companies use to supply consumers across the country with premium audio programming for both sports and news information. Any change in the current C-band operating environment could negatively affect our business[[3]](#footnote-3) and the American consumers we serve. Any removal or interference to the C-Band delivery system would catastrophically cripple our company and the programming we provide our network users. Millions of dollars in annual revenue from advertising sales in the radio industry would be compromised.

C-band offers reliability, quality, and cost efficiency that cannot be matched by other technologies or in other satellite spectrum. Fiber and Internet delivery methods are simply not reliable enough as we (the network provider) cannot control the “last mile of infrastructure” to our affiliate base. Also- such robust services are not readily available to our affiliated stations in various locations across the United States.

The KU-Band system is not a viable option as the increase susceptibility to attenuation, interference and signal fade due to atmospheric conditions like rain fade, snow fade- are larger implications into providing our content delivery. Switching away from C-band satellites would also strand the large-scale investment Learfield has made in the satellite uplink headend and ground stations equipment used for programming 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 Learfield 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 Learfield 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.

Learfield 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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|  | Learfield Communications  By: */s/* Randy W. Williams*p*  Chief Engineer  Learfield Communications  505 Hobbs Road  Jefferson City, MO 65109  573-893-7200 |

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Randy Williams- C.E.



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)