

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

Expanding Flexible Use of the 3.7 to 4.2 GHz Band	)	GN Docket No. 18-122
	)	
	)	
Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz	)	GN Docket No. 17-183
	)	(Inquiry Terminated as to 3.7-4.2 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	)	RM-11791
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Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service	)	RM-11778
	)	

**REPLY COMMENTS OF MAXAR TECHNOLOGIES HOLDINGS INC.**

As a leading global provider of integrated, advanced space technology solutions for its commercial and government customers, Maxar Technologies Holdings Inc. ("Maxar") recognizes that spectrum serves as a critical element of satellite operations.<sup>1</sup> Preserving existing satellite operations and allowing opportunities for future growth are paramount in any effort the Commission may take to expand flexible broadband use in mid-band spectrum. In the instant proceeding for the 3.7-4.2 GHz band (the "C-Band"), the C-Band Alliance's market-based approach provides the only solution that will fully protect satellite service while putting the decision to clear spectrum in the hands of the companies best positioned to evaluate the cost

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<sup>1</sup> Maxar submits these reply comments in response to the above-referenced Notice of Proposed Rulemaking seeking comment on expanding flexible use of the 3.7-4.2 GHz band. *See 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) ("NPRM").

trade-offs of such a transition. The voluntary, C-Band Alliance-led transition will also provide an immediate boost to domestic satellite manufacturing. For these reasons, Maxar supports the C-Band Alliance market-based approach.<sup>2</sup>

Maxar subsidiary DigitalGlobe provides groundbreaking enhanced Earth imagery and geospatial information using high-resolution satellites. As the first and only company to deliver true 30cm resolution imagery, DigitalGlobe offers state-of-the-art services from environmental monitoring and mapmaking, to capturing mission-critical images to support defense and public safety-related operations. DigitalGlobe's transformative Earth Exploration Satellite Service ("EESS") uses the 8025-8400 MHz band ("X-band") for downlink and telemetry, tracking, and control ("TT&C").<sup>3</sup> Maxar subsidiary SSL delivers integrated space technologies and systems for communications, exploration, data gathering, and next-generation services. SSL designs and manufactures innovative spacecraft and space-related systems with an advanced product line that includes high-power geostationary satellites, state-of-the-art small satellites, and sophisticated robotics and automation solutions for remote operations.<sup>4</sup>

In reply comments submitted in response to the Mid-Band Notice of Inquiry, DigitalGlobe made clear that expanded flexible use of mid-band spectrum must not come at the expense of incumbent satellite operations.<sup>5</sup> Here, Maxar agrees with the C-Band Alliance that C-Band FSS operations "represent an indispensable element of the nation's communications infrastructure."<sup>6</sup> Therefore, Maxar supports the C-Band Alliance's market-based approach, as it

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<sup>2</sup> *Id.*, at ¶¶ 66-97.

<sup>3</sup> DigitalGlobe also utilizes 401.5 MHz, 402.7 MHz, and the 2042-2095 MHz band frequencies for TT&C.

<sup>4</sup> Maxar's other subsidiaries are Radiant Solutions and MDA.

<sup>5</sup> Reply Comments of DigitalGlobe, Inc., GN Docket 17-183, at 1-3 (filed Nov. 15, 2017).

<sup>6</sup> Comments of the C-Band Alliance, at 11.

is the only proposal that will “protect[] the quality, reliability, and certainty of existing C-band Downlink services on which millions of customers rely.”<sup>7</sup>

The C-Band Alliance market-based approach also “represents the fastest way to repurpose C-band Downlink spectrum for terrestrial mobile services.”<sup>8</sup> To meet its 18-to-36-month clearing timeline, the C-Band Alliance specifies that “new satellites must be built and launched in time to complete all of the necessary transitions.”<sup>9</sup> Maxar supports the C-Band Alliance’s commitment that all potential satellite manufacturers will be U.S.-based,<sup>10</sup> which will immediately enhance American productivity and job growth.

For these reasons, Maxar urges the Commission to adopt the C-Band Alliance market-based approach without delay.

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_

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<sup>7</sup> *Id.*, at i-ii.

<sup>8</sup> *Id.*

<sup>9</sup> C-Band Alliance, *Notice of Ex Parte*, GN Docket No. 18-122, at 2 (filed Nov. 19, 2018).

<sup>10</sup> *Id.*