

December 17, 2018

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

**Re: Expanding Flexible Use of the 3.7 to 4.2 GHz Band
GN Docket No. 18-122
Ex Parte Meeting Notice**

Dear Ms. Dortch,

On December 13, 2018, the undersigned and other representatives of PSSI Global, L.L.C. met at the Commission with Matthew Berry, Chief of Staff to Chairman Pai, and Rachael Bender, Chairman Pai's Wireless and International Advisor. In addition to myself, PSSI Global was represented by its C.E.O., Robert Lamb, and PSSI Global's consultant, Peter Engel of WellsWentworth LLC.

Mr. Lamb gave a brief background report about PSSI Global, its role as the major mobile transportable company in the C-band, its Emmy award for what PSSI Global has contributed to production of programming on the C-band, and the dependence of programming on the continued availability of full-band/full-arc licensing policies. He explained how although its use of C-band was described as "occasional use," this was somewhat of a misnomer in that this involved, in fact, as many as 5,000 broadcast event days per year.

PSSI Global explained that for live events, reliability is critical. Neither fiber nor Ku-band could provide an adequate substitute for C-band and pointed out how in a major recent pay-per-view event, although it had been envisioned that the primary feed would be done by fiber, with PSSI Global providing the backup on C-band, the decision had been made to switch to the PSSI Global "backup" on C-band because of the superior programming quality.

If the Commission were to determine to reallocate some of the band for terrestrial mobile use, it was preferable to do so by means of a variation of the proposal by the C-Band Alliance, but that repurposing more than 100 MHz would result in substantial limitations on the current users of the C-band. Going from a bandwidth of 500 MHz to 400 MHz or even 300 MHz could directly and adversely affect the availability of frequencies and transponders. The reality of what will happen is that capacity will be reduced from 40 transponders to 20, with accompanying increases in cost and problems with access to transponders.

Mr. Lamb also explained the rationale for representation of satellite users like PSSI Global on any transition administration. Users of the C-band need a role on the transition board or oversight committee of any transition administration to make sure there is representation of their interests, not just the satellite operators. Otherwise, occasional users and their needs may not be adequately considered.

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Pursuant to Section 1.1206(b)(2) of the Commission's Rules, an electronic copy of this letter is being filed in the above-referenced docket, with copies to the Commission participants. Please direct any questions regarding this filing to me at stephen.diaz.gavin@rimonlaw.com or at 202-871-3772.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen Diaz Gavin", enclosed within a thin black rectangular border.

Stephen Díaz Gavin

cc: Matthew J. Berry
Rachael Bender