



October 20, 2014

FILED ELECTRONICALLY

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Expanding Access to Broadband and Encouraging Innovation through Establishment of an Air-Ground Mobile Broadband Secondary Service for Passengers Aboard Aircraft in the 14.0-14.5 GHz Band; GN Docket No. 13-114, RM-11640

Dear Ms. Dortch:

On October 16, 2014, representatives of the Satellite Industry Association (“SIA”) met with members of the FCC Chairman’s office – Diane Cornell, Renee Gregory, and Leah Rabkin – to discuss the satellite industry’s views on the above-captioned proceeding. SIA was represented by: Sam Black, SIA; Daniel Mah, SES; Sue Crandall, Intelsat; Alan Rinker, Boeing; Chris Murphy, Inmarsat; and Steven Doiron, EchoStar.

The satellite industry continues to have serious concerns regarding the proposal in the above-referenced proceeding to introduce a secondary air-ground mobile broadband service in the heavily-used 14.0-14.5 GHz band. As SIA has previously discussed, fundamental questions remain whether such a service could successfully co-exist with existing and future satellite networks.¹

The SIA representatives noted that the commenting parties seem now to have agreed that the proposed secondary Aeronautical Mobile Service (“AMS”) should be allocated an interference allowance of no more than 1% $\Delta T/T$, and reiterated that the 1% allowance in ITU-R Recommendation S.1432-1 is the total for *all* non-primary sources of interference into the primary FSS.² Given that there are other secondary

¹ See Comments of the Satellite Industry Association, *filed in* GN Docket No. 13-114, RM-11650 (filed Aug. 26, 2013) (“SIA Comments”); Reply Comments of the Satellite Industry Association, *filed in* GN Docket No. 13-114, RM-11650 (filed Sep.23, 2013) (“SIA Reply Comments”).

² See SIA Comments at 7-8, Technical Annex at 7; SIA Reply Comments at 2.

services in various portions of the 14.0-14.5 GHz band, the proposed AMS should be limited to 0.33% to account for these other services.³

The SIA representatives noted that without setting in advance of deployment a power limit for the AMS system's ground stations, it would be nearly impossible for either the Commission or AMS licensees to ensure that these new secondary services would be operated in compliance with the Commission's regulations. Without regulatory certainty, neither the primary nor the secondary licensees in the 14 GHz band will be able to confidently predict that they are delivering optimal services to their customers while also operating within the Commission's regulations.

The SIA representatives also requested that the Commission consider the impacts of the new secondary service on irregular FSS operations such as satellite launches. These operations, while conducted under Special Temporary Authorizations, are essential to the safe operation of geostationary satellites, which cannot be launched directly into their ultimate destination in orbit, and must instead spend a minimum of several days maneuvering from a geostationary transfer orbit (GTO) to their authorized orbital location. Recent technological innovations - most notably satellites with all-electric propulsion - will result in some of these satellite launch operations being conducted over a period of several months rather than several days. The first of these satellites is expected to be launched in early 2015, and many more have been ordered for delivery in the following years.⁴ The Commission must ensure that the presence of the secondary AMS would not have the practical effect of curtailing the future growth and flexibility of the primary FSS in the 14.0-14.5 GHz band.⁵ SIA continues to believe that these activities should be able to take place without coordination with or interference from secondary services.

³ See SIA Comments at 7-9, Technical Annex at 7; SIA Reply Comments at 2

⁴ See Peter de Selding, "Boeing Electric Satellite Backlog Poised to Grow, includes Previously Undisclosed U.S. Gov't Order," *Space News*, March 13, 2014, <http://www.spacenews.com/article/satellite-telecom/39853news-from-satellite-2014-boeing-electric-satellite-backlog-poised-to>.

⁵ See SIA Comments at ¶¶ 22-23.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION

A handwritten signature in black ink, appearing to read "Sam Black", is centered on a light gray rectangular background.

Sam Black, Acting President
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cc: (via e-mail)

Diane Cornell
Renee Gregory
Leah Rabkin