



February 12, 2015

**FILED ELECTRONICALLY**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 February 10, 2015, representatives of the Satellite Industry Association (“SIA”) met with Diane Cornell and Renee Gregory of the FCC Chairman’s Office to discuss the satellite industry’s views on the above-captioned proceeding. SIA was represented by: Tom Stroup and Sam Black, SIA; Nancy Eskenzai, SES; Sue Crandall, Intelsat; David Keir, representing Global Eagle Entertainment and Lockheed Martin; Sanford Jewett, Inmarsat; Dennis Burnett, Kymeta; Jason Davila, representing Panasonic Avionics; and Jennifer Manner, EchoStar.

The SIA representatives reiterated their concerns about the potential impact of the new secondary service on irregular FSS operations, the most notable of which are satellite launches. Such operations, while conducted under Special Temporary Authorizations (STAs), are essential to the safe deployment, testing, and operation of geostationary satellites. In addition to the satellite’s launch and early orbit phase, or “LEOP,” every geostationary satellite must conduct a de-orbiting operation using an STA, and many satellites also conduct satellite relocations or temporary operations pending grant of regular authority under this authority. Therefore, the SIA representatives urged that any Report and Order reflect the fact that these FSS operations, while temporary, are critical and must be protected from interference from secondary users in the same manner as permanent primary operations.

The SIA representatives also noted the recent announcements regarding plans to deploy non-geostationary satellite networks potentially using the 14.0-14.5 GHz bands. With these announcements, the need to ensure that any new regulatory framework offers sufficient protections for these new satellite constellations (with primary regulatory status in these frequencies) has become even more pronounced.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION

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cc: (via e-mail)

Diane Cornell  
Renee Gregory