



April 9, 2015

FILED ELECTRONICALLY

Marlene H. Dortch
Secretary Federal Communications Commission
445 12th Street N.W.
Washington, D.C. 20544

**Re: Notice of Ex Parte Presentation – GN 12-354
Amendment of the Commission’s Rules with Regard to Commercial Operations in the 3550-3650
MHz Band**

Dear Ms. Dortch:

On April 7, 2015, representatives of the Satellite Industry Association (“SIA”) met with Renee Gregory in the Office of Chairman Tom Wheeler and Brendan Carr in the Office of Commissioner Ajit Pai, to discuss satellite industry’s views on the above referenced proceeding.

The SIA representatives in attendance were: Tom Stroup, Satellite Industry Association; Patricia Cooper, Intelsat; Chris Murphy, Inmarsat; and Pascale Dumit, SES.

The SIA representatives stressed the need to provide adequate protection to incumbent satellite networks operating both in the 3600-3700 MHz band and systems in the adjacent 3700-4200 MHz band. SIA emphasized the risk associated with out of band interference if the FCC allows new entrants to operate on frequencies up to 3700 MHz, especially since there is the potential for interference to the telemetry control of satellites.

SIA suggested having stricter OOB limits at the 3700 MHz band edge and gave the example of the -50 dBm/MHz in the current LTE standards in the 1850 – 1915 MHz band (this was an example that the commission had provided in the FNPRM). SIA pointed out the significant difference of having the strict out-of-band emission limit apply at 3720 MHz versus at the 3700 MHz band edge. SIA asked at a minimum for the Commission to seek comments on their proposed OOB limits and the adequacy of their updated proposal for the strict limit to apply at 3720 MHz (versus the band edge), and how that may affect any required separation distances.

The SIA representatives urged the Commission to lift the freeze on deployment of additional FSS earth stations in the 3600-3650 MHz band, arguing that the freeze is fundamentally inconsistent with both the primary status of FCC and the concept of spectrum sharing. SIA also noted that the freeze may impact the ability to move earth stations upon the expiration of leases or otherwise modify equipment at those locations.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION

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cc (via e-mail):
Renee Gregory
Brenden Carr