

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC**

In the Matter of)	
)	
Recommendations Approved By The)	IB Docket No. 04-286
Advisory Committee For The 2015 World)	
Radiocommunication Conference)	

JOINT CONTENT INTEREST COMMENTS

CBS Corporation, 21st Century Fox, Inc., Time Warner Inc., Viacom Inc., Scripps Networks Interactive, Inc., and The Walt Disney Company (together and on behalf of their affiliated businesses, the “Content Interests”), hereby submit these brief comments in response to the Commission’s call for feedback on recommendations approved by the 2015 World Radiocommunication Conference Advisory Committee (“WAC”).¹ The Content Interests have a vested concern in the outcome of the 2015 World Radiocommunication Conference (“WRC”) given that our broadcast and cable network programming is distributed – both domestically and internationally – utilizing many of the spectrum bands for which WRC proposals are pending. These frequencies form a critical part of how we reliably deliver high-quality news, sports and entertainment content to hundreds of millions of consumers across the globe. Although our respective satellite vendors are the license-holders of these frequencies, since our business affiliates operate earth stations to receive content via these satellite signals, we nonetheless take seriously any proposal that could interfere with or interrupt the near-100% reliability we depend

¹ *FCC Seeks Comments on Recommendations Approved by the Advisory Committee for the 2015 World Radiocommunication Conference*, IB Dkt No. 04-286, Public Notice, DA 15-604, (rel. May 21, 2015).

upon to distribute compelling content worldwide. We therefore appreciate the opportunity to provide these comments.

Specifically, the Content Interests hereby indicate our support for WAC Item 116 – View A; WAC Item 117 – View B; and WAC Item 118 – View B. We provide below a brief overview of our views and otherwise refer the Commission to the comments filed as part of this proceeding by the Satellite Industry Association.

Item 116 – The Content Interests support the current United States proposal for No Change (NOC) to allocations in the 5925-6425 MHz (Earth to space) band across all three ITU Regions, as expressed in View A. As View A indicates, ITU-R studies showed that fixed satellite service space networks would be subjected to excessive levels of interference from the aggregate operation of IMT-Advanced (small cell) base stations (whether deployed outdoors or indoors). Given our reliance on U.S. satellites that are authorized to receive in the 5925-6425 MHz (Earth to space) band, which operate at orbital locations serving all three ITU Regions, the Content Interests endorse the perspective that the United States should protect these operations by proposing that no IMT stations be authorized to transmit in this band anywhere in the world.

Item 117 – The Content Interests do not object to the ITU commencing studies that might lead in the future to an Agenda Item focusing on additional spectrum for High Altitude Platform Service (“HAPS”). For now, however, the Content Interests are concerned about the broad spectrum ranges proposed in View A, including spectrum bands that are currently utilized for satellite services. Therefore, the Content Interests support View B. Any pursuit of this Agenda Item should be concentrated on *specific bands* that are expected to be suitable for HAPS, and not the scattershot approach of broad frequency ranges. The Content Interests also endorse the view

that protection of existing services be a key factor considered in evaluating any additional HAPS spectrum.

Item 118 – The Content Interests request that the Commission adopt View B. As drafted, View A fails to take into account valuable, existing services. This shortcoming disregards the important services currently provided by incumbent users and underscores the need for further specification of the spectrum requirements, the operational characteristics, and the incumbent protection methods before this Agenda Item would be ripe for further consideration. View B appropriately proposes a measured approach to considering IMT spectrum above 6 GHz for future WRC conferences.

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June 17, 2015