

August 28, 2015

VIA ECFS

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

Re: Use of Spectrum Bands Above 24 GHz For Mobile Radio Services; Petition for Rulemaking of the Fixed Wireless Communications Coalition to Create Service Rules for the 42-43.5 GHz Band; GN Docket No. 14-177 and RM-11664

Dear Ms. Dortch:

The Satellite Industry Association (“SIA”)¹ understands that the Commission is considering issuing a Notice of Proposed Rulemaking (“NPRM”) in this proceeding regarding spectrum for future mobile broadband operations, *i.e.* 5G services in frequency bands above 24 GHz. SIA urges the Commission to reject the suggestion that the Commission should attempt to adopt such an NPRM before the upcoming World Radiocommunication Conference 2015 (“WRC-15”) begins in November of this year.²

¹ SIA is a U.S.-based trade association providing representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. Since its creation twenty years ago, SIA has advocated on behalf of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business. For more information, visit www.sia.org. SIA Executive Members include: The Boeing Company; The DIRECTV Group; EchoStar Corporation; Harris CapRock Communications; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; LightSquared; Lockheed Martin Corporation; Northrop Grumman Corporation; SES Americom, Inc.; SSL; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Airbus DS SatCom Government, Inc.; Artel, LLC; Cisco; Comtech EF Data Corp.; DRS Technologies, Inc.; Eutelsat America Corp.; Glowlink Communications Technology, Inc.; Hughes; iDirect Government Technologies; Inmarsat, Inc.; Kymeta Corporation; Marshall Communications Corporation.; MTN Government; O3b Limited; Orbital ATK; OneWeb; Panasonic Avionics Corporation; Row 44, Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; Vencore Inc.; and XTAR, LLC.

² See Recommendations on the Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, Intel Corporation (Aug. 5, 2015), attachment to Letter to Marlene H. Dortch, Secretary, Federal Communications Commission, from Dave Horne, Intel Corporation, GN Docket No. 14-177 (filed Aug. 5, 2015) (requesting FCC action in this proceeding in advance of the WRC-15).

SIA further urges the Commission to not conflate the domestic and international arenas in this proceeding, and thus to not unnecessarily rush to take action prior to the WRC-15. In determining the specifics of any NPRM, the Commission's focus must be on addressing demonstrated demand for spectrum, identifying the specific usage and technical characteristics, and evaluating the interference environment for that spectrum in the United States.

This proceeding raises complex technical and policy matters that require careful scrutiny and full deliberation. In particular, the Commission must consider multiple factors affecting the suitability of various spectrum bands for prospective 5G services, including existing usage and future growth by current spectrum users and band-specific propagation characteristics. Input from a range of parties – current licensees, prospective 5G operators, equipment manufacturers, and standards organizations – is essential to developing a robust understanding of the myriad issues raised.

Significantly, this month alone, a number of parties have submitted or published detailed white papers and presentations regarding 5G services, which include technical proposals, discussion of standards, and implementation timelines.³ One such document was shared with Commission staff nearly four months ago but was only recently made available in the public record.⁴ In fairness to the other parties in this proceeding, including SIA and its members, and to ensure a more complete and informed record, the Commission should not adopt any NPRM before interested parties have had adequate time to review, analyze and respond, as necessary, to these extensive documents.

Moreover, WRC-15 is considering a number of topics to recommend for further study and making decisions on allocation matters that may be directly related to this proceeding. The Commission should issue an NPRM only after the Conference ends on November 27th so that interested parties can take those into account in this proceeding.⁵

For all of the above reasons, SIA requests that the Commission wait until after WRC-15, so that interested parties have sufficient time to assess the record, including the recent filings and publications regarding 5G services and can take into account the totality of WRC-15 recommended items for study and other decisions on allocation

³ *Id.*; see also 5G Spectrum Recommendations, 4G Americas, available at

<http://www.4gamericas.org/files/6514/3930/9262/>

[4G Americas 5G Spectrum Recommendations White Paper.pdf](#) (last visited Aug. 28, 2015).

⁴ See Letter to Marlene H. Dortch, Secretary Federal Communications Commission, from Brian Hendricks, Nokia Solutions and Networks US LLC, GN Docket No. 14-177 (filed Aug. 12, 2015), attaching presentation materials discussed in April 28, 2015 teleconference with Commission staff, "5G Requirements: Plan and timeline for ITU-R and 3GPP minimum technical performance requirements."

⁵ See International Telecommunication Union, World Radiocommunication Conference 2015,

<http://www.itu.int/en/ITU-R/conferences/wrc/2015/Pages/default.aspx> (last visited Aug. 28, 2015).

matters that may be related to the proposed NPRM.

Respectfully submitted,

SATELLITE INDUSTRY ASSOCIATION

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