

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
The Establishment of Policies and Service Rules for the)
Broadcasting-Satellite Service at the 17.3-17.7 GHz)
Frequency Band and at the 17.7-17.8 GHz Frequency)
Band Internationally, and at the 24.75-25.25 GHz) IB Docket No. 06-123
Frequency Band for Fixed Satellite Services Providing)
Feeder Links to the Broadcasting-Satellite Service and)
for the Satellite Services Operating)
Bi-directionally in the 17.3-17.8 GHz Frequency Band)

REPLY COMMENTS OF SES AMERICOM, INC.

SES Americom, Inc. (“SES”), by its attorneys, hereby submits this reply to the comments of other parties in response to the Public Notice regarding the Commission’s proposed rules on ground-path interference.¹ The record reflects broad agreement on a number of core principles, as discussed below. However, SES continues to oppose suggestions by other operators that the Commission should dictate the means by which the proponent of a new 17 GHz feeder link site mitigates potential interference to 17/24 GHz Broadcast-Satellite Service (“BSS”) operations.

Grandfathering: The commenters agree that existing Direct Broadcast Satellite (“DBS”) feeder links in the 17.3-17.7 GHz spectrum should be grandfathered and not subject to restrictions in order to protect 17/24 GHz BSS terminals that might be deployed later.² In

¹ Commission Staff Invites any Supplemental Information or Comments on Proposed Ground Path Interference Rules for 17/24 GHz Reverse Band Broadcast-Satellite Service (BSS) Operations, DA 15-1147, Report No. SPB-264 (Oct. 7, 2015).

² See Comments of SES Americom, Inc., IB Docket No. 06-123, filed Nov. 25, 2015 (“SES Comments”) at 1-2; Comments of AT&T, IB Docket No. 06-123, filed Nov. 25, 2015 (“AT&T Comments”) at 2-3; Supplemental Comments of EchoStar and DISH, IB Docket No. 06-123, filed Nov. 25, 2015 (“EchoStar/DISH Comments”) at 2-3.

addition, all parties now concur that there is no need for the Commission to define zones around existing DBS feeder link sites where 17/24 GHz BSS operations should be excluded.³ Instead, the consensus is that it should be up to a 17/24 GHz BSS licensee to determine whether and how it can provide service in the vicinity of a grandfathered DBS feeder link site, given that its services will not be entitled to claim interference protection from the DBS signal.⁴

There is also agreement on the need for some defined level of flexibility to modify or add antennas near DBS feeder link operations without a loss of grandfathered status.⁵ SES had previously suggested a 2000-foot radius within which such changes could be made, but upon further consideration, SES supports the larger one kilometer radius proposed by other parties.⁶

New 17 GHz Feeder Links: Commenters also support measures to allow deployment of 17 GHz feeder link stations at new sites provided that coordination with 17/24 GHz BSS operations in the vicinity has been successfully completed.⁷ AT&T agrees with SES that the procedures for DBS-MVDDS sharing should be employed for the coordination between new 17 GHz feeder links and 17/24 GHz BSS networks and that a neutral third party should serve as an intermediary to protect competitively-sensitive information.⁸ AT&T also now takes the position that no restriction is needed on the siting of new 17 GHz feeder links, as the

³ See AT&T Comments at 2-3 (agreeing with the arguments of SES and EchoStar that it is unnecessary to define an area around grandfathered DBS earth stations where interference would be likely to new 17/24 GHz BSS networks).

⁴ *Id.* at 3.

⁵ SES Comments at 2; AT&T Comments at 3; EchoStar/DISH Comments at 2.

⁶ See AT&T Comments at 3; EchoStar/DISH Comments at 2.

⁷ SES Comments at 2; AT&T Comments at 4; EchoStar/DISH Comments at 3.

⁸ SES Comments at 2; AT&T Comments at 4.

proponent of the new antenna will have ample incentives to choose a location that can be coordinated with any 17/24 GHz BSS operations nearby.⁹

SES reiterates its objection to AT&T's suggestion that the Commission should require shielding for every new 17 GHz DBS site.¹⁰ If an operator has chosen a location that is far from any 17/24 GHz BSS deployments, there is no reason it should also have to go to the expense of deploying shielding. Moreover, even if there are 17/24 GHz BSS terminals in the vicinity, the parties are in the best position to determine what interference mitigation techniques are appropriate and cost-effective. The same incentives that AT&T recognizes in the context of site selection will motivate the 17 GHz feeder link applicant to take the steps necessary to obtain a coordination agreement with the 17/24 GHz BSS licensee. Shielding should be an option to facilitate such an agreement, not a mandatory obligation applicable in every case regardless of the facts.

Respectfully submitted,

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⁹ SES Comments at 2; AT&T Comments at 5.

¹⁰ See AT&T Comments at 5. Similarly, AT&T proposes a power-flux density (pfd) limit that a 17 GHz feeder link operator would have to meet 10 km from its earth station. This pfd limit is tied to AT&T's proposal for a 10 dB mandatory shielding attenuation. As a result, SES also opposes application of this pfd limit.