

Satellite Industry Association
Part 25 FNPRM – IB Docket 12 – 267
December 2015

Background

- SIA appreciates the diligent work of IB staff in preparing this Further Order and the support of the FCC on moving this item forward efficiently.
- Streamlining is very important to the satellite industry. It will accelerate the development and deployment of new satellite systems and new earth station technologies, and facilitate broadband competition and entirely new uses of satellite systems.
- There has been broad industry support for SIA’s proposals, and no oppositions have been filed.

Streamlined Processing of Satellite Systems (Space Stations)

Timing of FCC Filing with the ITU

- SIA supports the FCC’s proposal to enable the FCC to file the appropriate ITU filing for a geostationary orbit satellite space station for non-planned fixed satellite service spectrum bands before requiring a full space station application to be filed.
 - This will ensure that the U.S. operators are able to develop and execute their ITU filings and their systems in a manner that recognizes how satellites are constructed and deployed.
- FCC should expand this proposal to enable the FCC to file the appropriate ITU filing prior to filing a license application for all geostationary satellite and non-geostationary satellite operations in satellite service frequency bands.

Milestones and Bonds

- SIA supports the streamlining of the FCC’s current milestone and bond rules.
 - Specifically, for any milestone that is retained, SIA urges the FCC to enable the satellite licensee and an independent manufacturer to certify completion of the milestone and provide evidence such as a picture of the satellite’s communications panel or primary structure.
- FCC should streamline the critical design review (“CDR”) milestone.
 - Current requirement to submit CDR documentation unduly prolongs milestone review and creates unnecessary risk that highly sensitive commercial information could be inadvertently disclosed.

- It should be sufficient if both the satellite licensee and an independent manufacturer certify completion of the CDR milestone and provide evidence such as the CDR meeting agenda, the list of participants, and when and for how long the CDR team met.
- Milestone compliance filings should be deemed granted if not acted upon within 60 days of filing.
- The FCC should not increase the existing bond amount.

Earth Station Technical and Licensing Rules

- SIA members seek to bring new products to market faster. New technologies offer exciting opportunities for the satellite industry to serve new markets, and to serve existing markets with improved services.
- Overly stringent technical standards hamper flexibility and delay licensing and deployment (because of the need to obtain waivers). Accordingly, SIA supports the FCC streamlining of the technical rules, and in some cases, relaxing the Part 25 technical rules.