January 21, 2016

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* – Eleventh Broadband Progress Notice of Inquiry, GN Docket No. 15-191

Dear Ms. Dortch:

The Satellite Industry Association (SIA)[1] files this ex parte in the above-referenced proceeding to urge the Commission as it releases its Section 706 Broadband Progress Report to recognize the significant investments satellite providers have made—and continue to make—to expand the availability of advanced telecommunications capability that will meet or exceed the Commission's benchmark.

[1] SIA is a U.S.-based trade association providing representation of the leading satellite operators, service providers, manufacturers, launch services providers, ground equipment suppliers, and earth observation companies. 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. SIA Executive Members include: The Boeing Company; The DIRECTV Group; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; LightSquared; Lockheed Martin Corporation; Northrop Grumman Corporation; SES Americom, Inc.; Space Exploration Technologies Corp.; SSL; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Airbus DS SatCom Government, Inc.; Artel, LLC; Cisco; Comtech EF Data Corp.; DigitalGlobe Inc.; DRS Technologies, Inc.; Eutelsat America Corp.; Global Eagle Entertainment; Glowlink Communications Technology, Inc.; Hughes; iDirect Government Technologies; Inmarsat, Inc.; Kymeta Corporation; Marshall Communications Corporation.; O3b Limited; Orbital ATK; OneWeb; Panasonic Avionics Corporation; Planet Labs Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; and XTAR, LLC. For more information, visit www.sia.org.

In the Section 706 Broadband Progress Report Fact Sheet ("Fact Sheet") released by the Chairman's office on January 7, 2016, the Commission cites to a number of ongoing industry actions, including investments by the wireless and wireline industries, which have served or are serving to increase advanced communications deployment in the United States.[2] Unfortunately, the Fact Sheet does not acknowledge the significant investments the satellite industry is making in expanding delivery of state-of-the-art broadband services to U.S. consumers.

For example, later this year EchoStar will expand its broadband satellite network by launching EchoStar XIX, with over 150 Gbps of throughput.[3] Soon after that, ViaSat will expand its broadband network by launching ViaSat-2, doubling the bandwidth economics and offering seven times the coverage of ViaSat-1.[4] ViaSat's announced ViaSat-3 three-satellite constellation will have a throughput capacity of 1 terabit per second each.[5] Intelsat will shortly launch the first of its Epic^{NG} satellites, which will be capable of meeting or exceeding the FCC's 25 Mbps/3 Mbps speed benchmark for advanced communications and will provide service later this year.[6] The investment for the construction and launch of these new satellites by EchoStar, ViaSat and Intelsat represents billions of dollars of investment in new broadband infrastructure.

Other members of the satellite industry are making additional investments to bring advanced communications to U.S. consumers. OneWeb has recently raised more than 500 million dollars for its global NGSO network.[7] O3b, which is already serving U.S. customers in the telecommunications, energy, maritime and government sectors, has raised $460 million in order to add another 8 satellites to

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[2] Fact Sheet: 2016 Broadband Progress Report, Chairman's Draft at 2 (Jan. 7, 2016), http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0107/DOC-337173A1.pdf.

[3] *See* Press Release, "Hughes Selects Space Systems/Loral to Build World's Highest Capacity Broadband Satellite" (Mar. 21, 2013), http://www.hughes.com/resources/hughes-selects-space-systems-slash-loral-to-build-worlds-highest-capacity-broadband-satellite-1.

[4] *See* ViaSat, ViaSat Services + Systems, High-Capacity Satellite System, *available at* https://www.viasat.com/products/high-capacity-satellites.

[5] *See* ViaSat, Inc. 10-Q (Sept. 30, 2015) at p. 41.

[6] Intelsat, Intelsat EPIC^{NG}, The Next Generation of Satellite Technology, http://www.intelsat.com/infrastructure/intelsat-epicng/.

[7] *See* Press Release, "OneWeb announces $500 million of a-round funding with group of leading international companies" (June 25, 2015), http://www.oneweb.world/#news.

its high throughput, low latency NGSO constellation.[8] The new satellites will add over 120 Gbps of throughput to O3b's total capacity.

These examples evidence the significant investment the satellite industry is making in advanced communications. The Commission should explicitly recognize this investment in its Section 706 Progress Report to ensure the report accurately reflects the state of broadband deployment by the satellite industry.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION

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[8] *See* Press Release, "O3b Networks announces the closing of $460M in financing to expand its constellation and support unprecedented customer growth" (Dec. 10, 2015), http://www.o3bnetworks.com/o3b-networks-announces-closing-460m-financing-expand-constellation-support-unprecedented-customer-growth/.