March 1, 2016

VIA ELECTRONIC DELIVERY

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

Re: Notice of *Ex Parte* – Use of Spectrum Bands Above 24 GHz For Mobile Radio Services Notice of Proposed Rulemaking, GN Docket No. 14 – 177, IB Docket Nos. 15-256 & 97-95; RM-11664; WT Docket No. 10-112

Dear Ms. Dortch:

On February 29, 2016, representatives of the Satellite Industry Association Regulatory Working Group ("SIA RWG") [1] met with FCC staff to discuss various matters of interest to the satellite industry.

Attending on behalf of the SIA RWG were: Tom Stroup, SIA; Jennifer Manner Echostar; Bruce Olcott, Jones Day (for Boeing); Candice DeVane, Intelsat; Suzanne Malloy, O3b; John Janka, Latham (for ViaSat); Jack Wengryniuk, AEG; Joe Godles, Goldberg Godles (for Iridium); Giselle Greeser, Inmarsat; Petra Vorwig, SES; and Scott Kotler, Lockheed Martin.

Attending on behalf of the FCC were: Michael Ha, Matthew Pearl, Jose Albuquerque, Robert Nelson, Martin Doczkat, Simon Banyai, John Schamble, Stephen Buenza, Charles Oliver, Tim Hilfiger, Nancy Zaczek, Blaise Scinto, Catherine Schroeder, Bahman Badipour, and Ahmed Lahjouji.

In the meeting, SIA's comments followed the attached talking points.

Please contact the undersigned with any questions related to this filing.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION

Tom Stroup, President
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Washington, D.C. 20036

Attachment

cc (via e-mail):
Michael Ha
Matthew Pearl
Jose Albuquerque
Robert Nelson
Martin Doczkat
Simon Banyai
John Schamble
Stephen Buenza
Charles Oliver
Tim Hilfiger
Nancy Zaczek
Blaise Scinto
Catherine Schroeder
Bahman Badipour
Ahmed Lahjouji

[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. For more than two decades, 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; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; LightSquared; Lockheed Martin Corporation; Northrop Grumman Corporation; OneWeb; 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; 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; Panasonic Avionics Corporation; Planet Labs Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; and XTAR, LLC

SATELLITE INDUSTRY ASSOCIATION VIEWS ON THE SPECTRUM FRONTIERS PROCEEDING (GN DOCKET 14-177)
The Critical Role of Satellite Communications Services in the Above 24 GHz Bands

Satellite services play a vital role in U.S. telecommunications and are likely to be a critical component of 5G service delivery.

- Satellite operators provide essential broadband and advanced video services to tens of millions of U.S. urban, suburban and rural customers (carriers, businesses, and individuals), promoting competition for advanced communications
- Satellite operators connect underserved and otherwise unserved areas and populations; without satellite, millions of U.S. consumers would not be able to have access to advanced communications services at reasonable rates, if at all
- Satellite will complement terrestrial networks, providing ubiquity, security and reliability to 5G networks and to Internet of Things applications
- Satellite is uniquely situated to provide mission critical national security and emergency communications, even when the terrestrial infrastructure is unavailable
- The satellite industry continues to innovate with multiple new advanced communications and broadband satellites being placed into operation as early as this year, expanding the speed and offerings across the U.S. to consumers, enterprises and government

Satellite operators need continued certainty regarding access to spectrum in the above 24 GHz bands to meet U.S. consumer needs.

- Satellite operators have made enormous investments on the basis of the current rules, which do not authorize terrestrial mobile use
    - Secondary status created by rule with respect to LMDS only
    - Current FSS operations are compatible with LMDS
    - Settled FSS licensee expectations for use of 28 GHz spectrum must be protected
- Complex technology typified by long lead times, large upfront costs, and investment recovery over long asset service life
- Impairment of 28 GHz spectrum would place existing Ka-band services at risk and decelerate satellite expansion and innovation, harming U.S. consumers, including those who have NO access to other advanced communications services
- Availability of V-band spectrum is critical to meet the ever-increasing demands for satellite-based broadband capacity

The FCC must ensure individually licensed FSS earth stations can operate in the 28 GHz band and V-band.

- Protections must be available without a cut-off date for rights to spectrum
- More protections are needed for earth stations in terrestrial incumbent license areas if mobile is upgraded to co-primary status

- Auction and secondary market mechanisms are inefficient and unreliable due to the differing needs of satellite and terrestrial operators

Individually licensed FSS earth stations should be granted co-primary status with other allocated services (fixed and mobile) in the 28 and 39 GHz bands.

- Promote the continued provision, expansion, and enhancement of satellite services
- Solidify the United States' position as a leader in advanced satellite communications
- Sharing rules can be developed today to enable the use of both FSS earth stations and new terrestrial technologies
- While the FCC's initial focus in this proceeding should be on fixed earth stations in the 28 GHz band, mobility of earth stations in the band also must be accommodated