



April 7, 2016

Federal Communications Commission
445 12th St. SW
Washington, DC 20554

RE: IB Docket No. 12-267

To whom it may concern

I am writing in comment to the above proceeding regarding the "Implementation of Section 25.281(b) Transmitter Identification Requirements for Video Uplink Transmissions."

Our understanding is that this requirement has been pushed by large equipment manufacturers who stand to gain revenue from the sale of new modulators needed to comply with the mandate. The rule, however, does not take into account the severe negative impact on individual companies in the satellite broadcasting industry. Do you know, for example, that for most providers, compliance cannot be attained with just an update? Brand new encoders at a sample cost of \$40,000 each must be purchased. Each truck has at least two and most times more encoders on board.

In our case in particular, our encoders cannot be updated to comply. It has been mentioned that a new modulator could be purchased, however, with the design of our truck and space limitations thereof, we need to have the modulator built into the encoder. There is no room for a separate piece of equipment. In order to be in compliance, therefore, we need to purchase two new encoders to replace the perfectly fine ones that we currently own. Since compliance will be an issue, there will be no resale value to the equipment we would have to replace, so we are just simply on the line for \$80K. (See attached quote)

The majority of our industry's companies, like our business, Satellite Communication Systems, have only one to three trucks and are small businesses. They (We) cannot absorb that kind of financial hit. The choice becomes compliance and financial ruin or non-compliance. Either way, the outcome is that a company like ours will be forced to cease business. Those few companies that have numerous trucks are forced to purchase this new equipment for each of their 10 to 30 trucks making the investment equally devastating and easily in the millions.

To give you a picture of our situation, we are a small family owned company. We have two employees – both family, and we have one truck. We are just now starting to recover from the past 7 years of horrible business due to changes in the industry and, primarily, the economy. We are still paying off a great deal of debt that was accumulated just trying to keep the doors open for all those years. To have to come up with \$80K, even in the next year, would be an undue hardship. To put it in perspective, our net income for the last year was only \$100K. Even this is misleading since most of that money went straight to debt that is not deductible on our taxes.

Satellite Newsgathering is the backbone of the live news industry. Without satellite trucks, the industry will be set back 30 years. With companies unable to afford compliance, trucks will be taken off the road and businesses will close. While we understand the reason behind carrier identification, it is obvious that the original rule in question was created without crucial input from the industry segment that it stands to severely cripple. We appreciate the fact that the Commission is now seeking more input to arrive at a suitable solution. We respectfully request that the FCC take another look at the requirements and work with the industry to come up with a better solution. Just as the FCC enabled television owners to get free digital conversion boxes to avoid the negative impact of digital TV network requirements, we request some sort of palatable solution to the issue at hand. As the rule is written – even with the temporary revision, the negative impact far outweighs the positive.

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Thank you for your attention to this matter. I can be reached for any further information or discussion on the issue at 847-526-3020 or via email at bill@1800usalink.com. Please act quickly. Our industry and, more specifically, our company and the family that runs it are depending on you.

Best regards,
Satellite Communication Systems

A handwritten signature in black ink that reads 'William A. Schmitz'.

William A. Schmitz
Director of Engineering

Enclosure: Quote for encoders
(Note that this quote is for one encoder only; we need two)

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Adtec Productions, Inc.
408 Russell St.
Nashville TN 37206

Bill To
Bill Schmitz
Satellite Communication System
P. O. Box 787
Wauconda IL 60084

Ship To
Bill Schmitz
Satellite Communication System
P. O. Box 787
Wauconda IL 60084

Offer Of Sale

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Date 3/7/2016
Offer Of Sale EST16-6107

Email

Ship To Phone

Expires	Exp. Close	Sales Rep	Memo	PO #	Terms	Shipping Method
4/6/2016	3/30/2016	James Moore	1xEN210			UPS Ground
LN#	Item	Qty	Description	Serial Number	Price	Amount
1	EN210/1F/LB/10M	1	Adtec Contribution Single Channel Encoder supporting SD HD MPEG2 (4:2:0 & 4:2:2) 8bit up to 1080i, SD HD MPEG4 (4:2:0) 8bit up to 1080i, SD HD MPEG4 (4:2:2) 10 bit up to 1080i, video encode. Includes IF/L-Band DVBS/S2/S2X capable modulator with 10 Mhz insertion. Supports up to 56Mbaud and 64APSK. Modulation feature keys are required and sold separately. Inputs: Composite, SDI, SFP, AES and Analog Audio. Outputs: ASI, RF and IP Standard Features: BISS, FEC, DolbyE Passthru & VBI processing. 1RU Chassis, redundant AC power supplies, and front panel.		18,000.00	18,000.00
2	ZA-Keep Fill Part	1				
3	EN210-M2/M4-HD-10-KEY	1	Software Option - Supports SD HD MPEG2 (4:2:0 & 4:2:2) 8bit up to 1080i, SD HD MPEG4 (4:2:0) 8bit up to 1080i, SD HD MPEG4 (4:2:2) 10 bit up to 1080i, video encode. Field upgradable feature key.		5,000.00	5,000.00
4	EN2XX-MP1-AUD-KEY	1	Software Option: MPEG 1 Layer 2 audio encode. Supports 8 pairs. Field upgradable feature key.		1,250.00	1,250.00
5	IF/LB/10M-8PSK-KEY	1	Software Option: QPSK/8PSK with 5%-35% rolloff up to 36 Mbaud. Field upgradable feature key.		4,500.00	4,500.00
6	IF/LB/10M-16APSK-KEY	1	Software Option: QPSK/8PSK/16APSK with 5%-35% rolloff up to 36 Mbaud. Field upgradable feature key.		5,250.00	5,250.00
7	IF/LB/10M-32APSK-KEY	1	Software Option: QPSK/8PSK/16APSK/32APSK with 5%-35% rolloff up to 36 Mbaud. Field upgradable feature key.		6,000.00	6,000.00
8	IF/LB/10M-CID-KEY	1	Software Option: Enables RF Carrier ID information to be transported for vendor identification. Field upgradable feature key.		300.00	300.00

The purchaser agrees to pay the total price shown on this document and accepts Adtec's Warranty, Terms and Conditions of Sale. For more information, go to <http://adtecdigital.com/salesterms>.



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408 Russell St.
Nashville TN 37206

Offer Of Sale

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Date 3/7/2016
Offer Of Sale EST16-6107

LN#	Item	Qty	Description	Serial Number	Price	Amount
9	SLA STANDARD	1	Services: Technical support during regular business hours Initial product orientation Firmware and software upgrades		0.00	0.00

Subtotal 40,300.00
Shipping Cost (UPS Ground) 35.00
Total US\$40,335.00

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