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Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: IB Docket No. 12-267, DA 16-367
Compliance response of proposed CID Section 25.281 (b)

To Whom It May Concern:

We at First Call Uplinks have a small operation, 3 SNG trucks and with the encroachment of bonded cellular, video over IP, and fiber we have had a major decrease in business.

When first confronted with the addition of CID we as many others in our industry were told by our encoder/modulators manufacturer, our units being only a few years old, were upgradable. When faced with the first deadline and investigating the actual purchase of upgrades were advised the units would have to be replaced, upgrading was not an option because of the age.

The overall cost of replacement equipment (encoder/modulator) is upwards of \$ 98,000.00, per truck, a huge burden on a company of our size.

All of our encoders in the "Service Provider" list our company name, truck number and path, and in the "Carrier ID" section any information needed could be provided.

In my opinion the operators and engineers that access the satellite system use a great deal of care to avoid issues, I don't believe any further clarification of a valid carrier is needed.

George Schraffenberger, Chief Engineer

First Call UPLinks