May 3, 2016

To:
The Federal Communications Commission
445 12th Street South West
Washington, D.C. 20554

Re: IB Docket No. 12-267, DA 16-367
Carrier ID comments CID Section 25.281(b)

To Whom It May Concern:

I am an operator, not an attorney, owner, or electrical engineer. For 16 years, I have operated a transportable earth station, commonly called a Satellite Truck. In that truck, I operate the visual and audio gear to transmit a reliable signal to contracted satellite space, where typically a network will downlink my signal for inclusion in a newscast or live event.

I have been the "victim" of rogue carriers a few times. On rare occasion, I personally have entered certain frequency numbers transposed, and at low power found myself NOT on my assigned frequency. Considering that we're all human, things happen without malice or intent, from time to time. But most people are aware and take corrective action in moments.

With or without "CARRIER ID" (CID), these incidents will continue to happen, more so with inexperienced people operating very technical gear. Automated equipment that has failed is also a culprit, and for those incidents where a human may not act to stop the errant transmission, some sort of identification would be crucial. It is my understanding that this requirement may not be enforced for some of the automated equipment. That eliminates much of the promise of CID.

Working in my satellite truck, I always insert identification in my transmissions. I have two opportunities to insert identification, with a "Network Name" and "Service Name", where I identify my employer clearly in the Network Name field.

If I were to modulate over another satellite user, as I understand, the CID requirement may well yield nothing until the affected user drops their signal. Unless the offending signal is present for more than a few moments, locating the signal by CID or by other methods available to satellite providers will not yield any results, until efforts are coordinated to track down the offender. Most interference is for moments, not even a minute in duration.

The cost to my employer, Moonlink Satellite, to make our inventory of transmission devices compliant would be prohibitive in cost. Our newest gear is, by and large, ready to go, but we maintain older equipment for those bigger weeks, but older gear allows us to add capacity with assets we already own. Ironically, CID implies that the offenders are

compliant, using the newest equipment at great expense.

There is a large aftermarket for older equipment. Search eBay for encoders and modulators and you constantly find equipment that is obsolete, by our companies standards, for sale. Since those will not be destroyed, upgraded or surrendered, they will be available to anyone wishing to transmit a signal, CID or not.

Again, I am simply a citizen who happens to operate a transmitting station on wheels, but I also believe that, while well intended, the CID requirement will meet with little to no success in eliminating interference. Perhaps it will assist in apprehending COMPLIANT accidental transmissions, but if a scofflaw put a signal up without CID, the whole intent of the new regulations will be useless.

Thank you for your time.

Kevin Stebleton
Moonlink Satellite
2716 Balsam Way Drive
Sterling Heights, MI 48314
810-499-4452