

# MEINHARDT PRODUCTIONS

*Network Television Specialists*

MIKE MEINHARDT  
5555 N. Cumberland Ave.  
Suite 601  
Chicago, IL 60656  
312/685-9776 (cellular)  
mike@meinhardtproductions.com

Federal Communications Commission  
445 12 Street S.W.  
Washington, DC 20554

May 3, 2016

To Whom It May Concern,

I am writing to comment on the planned implementation of FCC rule, Section 25.281(b) Transmitter Identification Requirements. With the Commission's planned implementation of new Carrier Identification (CID) requirements for satellite transmission, my small business will realize a financial hardship imposed by the requirement to replace a very costly lot of equipment that was recently placed into service. Furthermore, we are not responsible for interfering signals and the implementation of CID will NOT prevent any signal interference, it will only aid in identifying a carrier that is already established with very strict transmission access procedures, including real-time telephone contact with the engineer establishing the signal. In other words, the CID will not serve much purpose in the area of the industry that our business serves. Furthermore, it has been well documented that unattended VSAT and data transmission systems are often the cause of interference--we are not involved in any operations like this. Additionally, our company has never been the cause of any signal interference and we proudly will state that our professional standards that prevent any problems are also embraced by our colleagues at competing businesses.

Meinhardt Productions operates a small fleet of three satellite uplink trucks that solely does transmission for the major national news and sports television networks. Our business is small, but our work is seen by millions of people every week, as we contribute to the television broadcast industry. We take pride in our product, our training, and in our state-of-the art equipment that we spend considerable money on keeping current. With the proposed implementation of the Commission's CID requirements, ALL of our video encoder/modulators and outboard modulators will be rendered obsolete and useless. We have over 16 units that will cost approximately \$40,000.00 EACH to replace with new equipment that has CID capability. This will amount to approximately \$640,000.00 in unplanned expenditures—something that is simply too costly for our 3-person business to absorb. Additionally, the majority of these units were purchased within the last 2 years and were considered current technology UNTIL this proposed CID requirement was brought to light.

In summary, the proposed CID requirement will cause a needless financial hardship to many, if not all, of the various satellite uplink truck operators in business today. The majority of the uplink trucks are operated by trained and skilled engineers that are competent operators that transmit only after careful transmission access is granted by satellite spacecraft operations centers. We urge the FCC to reconsider the implementation of CID requirements for our segment of the industry, or at the very least consider a delayed implementation of the requirements for a period of at least 5 years, that will allow us to use current equipment until it is no longer useable.

Sincerely,  
Michael Meinhardt  
President, Meinhardt Productions, Inc.