

May 2, 2016

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)

ELECTRONICALLY FILED VIA ECFS

Dear Sir or Madam:

We are owners and operators of a transportable satellite uplink vehicle, a "satellite truck". My wife and myself own the company, and we have been in business for 10 years. We have made a decent living traveling around the US providing satellite uplink services for various television networks and corporate entities. I operate the truck; my wife handles paperwork from home while she cares for our 5 children. It is expected in this business to periodically make capital investments to stay current with new technology and provide our clients with the services they need as that technology changes. However the mandate to replace our modulators due to the carrier ID requirement will tax our financial resources heavily. We currently have late model modulators (Newtec AZ110 units) that serve our needs well. These units cannot be upgraded to transmit carrier ID and thus will become worthless in the near future. I've gotten quotes from both Newtec (the industry leader) and one of their competitors; Teamcast. CID compliant Newtec units cost just under \$11,000.00 each; the Teamcast units were \$8,780.00 per unit. Our clients require us to be redundant with all transmission equipment, so our total expense will be approximately \$17,500 to \$22,000 depending on which units we choose. Like many small businesses, ours is partly a labor of love. We make an acceptable amount of profit, but realize we will never get rich. However expenses like this cut deep. This is compounded by the fact that our used units, while still working fine, will have no resale value since they're not CID compliant. These otherwise useable units will be scrapped. This comes at a time when encoding technology is changing and we need to spend money on newer encoding gear. Our company cannot afford to do both, and we will be behind the curve if instead we are forced to spend the money on modulators that offer our clients nothing more than the old units, save for the legal CID requirement.

Much has been said about reducing satellite interference. As a frequent user of satellite space I am in full support of that. From my standpoint as an independent vendor to large 3 and 4 letter television networks, nothing makes our small company look worse than getting knocked off the satellite by harmful interference. We take such matters seriously; in the same fashion an airline pilot needs safe airspace in which to fly. In my television career, 19 years to this point, I have seen

very few situations in which CID technology would have provided a quick resolution to a problem. The law is further bungled in requiring mobile trucks to be in compliance with CID at an earlier date than fixed earth stations (teleports). The majority of the time I've encountered interference it was either by a malfunctioning VSAT unmanned station (this is most of the time) or a carrier from a teleport's antenna. We are required to provide the satellite operator with a phone number where we can be reached and to stay with the transmitters for the duration of the transmission. Otherwise our antennas are folded down onto the roof of the truck and could not possibly create interference. We're simply not pointed at the satellite! Interference from teleports, while somewhat common in my experience, is never intentional. Rather it is an accidental transmission from one of their many antennas. Often it takes a while for their operator(s) to locate which one because they have so many. As a satellite truck operator, I have only one antenna to watch! In the old days of analog FM modulated satellite transmissions we had a CW (morse code) ATIS system for ID. I cannot remember a single instance where it helped with harmful interference. We should rather be more stringent that operators **MUST** be available at the phone number given to the satellite operator at all times during transmission. This is already the rule. CID is only going to broadcast your phone number, GPS coordinates, and the MAC address of the modulator. Of those 3, the phone number is what matters. We already have a rule requiring that.

I thank you for extending the timeline to accept additional comments on this manner. Our industry is a small one and the vast majority of us pride ourselves on reliability and consistency. I know our competitors by name and count many of them as friends. Although that may sound strange, it really is not. We swap jobs occasionally and send jobs to each other when we are already booked. As I have conversed with other satellite truck operators, no one has told me they believe the CID mandate will help reduce satellite interference. Many believe the equipment manufacturers have pushed this through in an effort to boost sales. I hope that is not the case. Please feel free to contact me if there is any additional information I can provide or if clarification on any of the above is needed.

Yours truly,

Chris Kelley

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