

CENTRAL SATELLITE SERVICES LLC
4466 Chesswick Dr.
Cincinnati, OH 45242

May 4, 2016

FCC
445 12th Street SW
Washington, DC

Re: DA 16-367 / IB Docket #12-267
Response to CID / Section 25.281(b)

To Whom It May Concern:

This proposed mandate for identifying satellite carriers will cause a real financial burden upon our industry.

For me as a small business owner, we have a fleet of 2 uplink trucks, and the equipment in our trucks is only 5 years old. As the equipment advances, we do our best to make decisions regarding purchases that will best suit our clients' always changing needs. We have to add specific satellite equipment to meet these needs. Over the past years, we have purchased specific equipment that would allow us to stay ahead and also plan for upgrades for the next few years to stay current with our clients' requirements.

Our company is now facing a very expensive issue with regard to the proposed CID mandate by the FCC to change the current equipment in our 2 trucks, which will cause a huge financial burden for us. We paid for very expensive licenses (options) on each of the encoders, decoders, and modulators. The necessary license key for this equipment is long and expensive. Each one of these licenses can cost thousands of dollars for each individual encoder, modulator, and decoder.

For us, this equipment we purchased just 5 years ago will be rendered WORTHLESS as no one could use it. So it's not just the expense to purchase the new CID equipment with which I am concerned, it's all of the money I've invested in the current gear. As a business owner and an FCC licensed company, I could never have planned for the purchased satellite equipment to lose value so quickly with this potential CID requirement.

I also believe there could be a lower cost CID solution to identify a carrier through some sort of "insertion" solution. Stick it on a line of video within our transmitted service. This way we all could avoid reinvesting and retraining our operators on new satellite equipment. There has to be an easier way to achieve CID than replacing expensive equipment, such as a simple insertion box that would embed a line in the video signal to show the Carrier ID. I'll bet the box could be made and sold for \$1,500 or less. This information is being transmitted now in the Service Provider Data of the current encoders.

I ask that the FCC seriously consider a "grandfathering in" period for all of us in the temporary portable uplink services business, or consider a compliance date 5-7 years down the road, so we have an opportunity to recoup some value and profits from our current and very expensive investments. This would also give the manufacturers time to sell "CID Ready" equipment, so it will be what we purchase next in our overall purchasing plans. If CID was not an issue right now, my next big wave of updates to my trucks would not happen for at least 2-4 years, as I made purchasing decisions on equipment that had room for software upgrades over this time period. Much of this gear will not allow for the CID upgrade. It's unfortunate that the manufacturers were not more on-board with CID long before now.

Please consider a slower implementation of this CID requirement. If you have any questions or would like to discuss this directly with me, I am available on my cell phone at any time. Thank you for the opportunity to share my views in this matter.

Sincerely,

Duane K. Prince
EIC/TES Owner
Central Satellite Services, LLC
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