

CENTRAL SATELLITE SERVICES
4466 Chesswick Dr.
Cincinnati, OH 45242

May 4, 2015

FCC
Washington, DC

R€ #12-267
Response to CID / Section 25.281{b}

To Whom It May Concern:

The proposed mandate for identifying satellite carriers will cause a real financial burden upon our industry and specifically to our company. This in turn will have a noticeable effect on the transmission of all sorts of television communication across the country. When a national story breaks, the television networks don't send their trucks the story first. They call us and our trucks arrive on the site first. So less trucks on the road mean less options for news networks.

As a small business owner, we have two uplink trucks, and the equipment in our trucks is only five 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 two 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. Each one of these licenses can cost thousands of dollars. For us, the equipment we purchased just 5 years ago will be rendered **WORTHLESS**. Imagine, after only five years the equipment is of no value. How can our company stay in business and provide service with that kind of business model? So it's not just the expense to purchase the new CID equipment with which we are concerned, it's all of the money we've invested in the current gear.

As a business owner we 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. This information is being transmitted now in the Service Provider Data of the current encoders.

I ask that the FCC consider a "grandfathering-in" period 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. 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.

Please consider a slower implementation of this CID requirement.

Sincerely,
James I. Timmerman
Partner
Central Satellite Services, LLC