

May 1, 2016

Ms. Marlene H. Dortch  
Secretary, F.C.C.  
445 12th Street, SW Washington, DC 20554

RE: FCC IB Docket 12-267

Dear Madame Secretary,

I am writing to you regarding the pending implementation of the Carrier Identification. (CID).

I am the owner and sole operator of a one truck satellite company based near Portland, Oregon. I have been in business since 2004. Like others in my business we have been crushed by the economic collapse in 2009, and have been required to do several expensive technical upgrades to our vehicles.

My professional broadcast television career dates back to 1979 when a First Class Radio Television license was a requirement. Over the years we have seen the FCC relax various requirements for the license. Some of the reasons have to do with changes in technology. Some are purely economic.

For example, a TV station is longer required to post an engineer at the transmitter site to monitor the operation of the broadcast transmitter. Technology reached the point where a transmitter could be reliably monitored by a remote location. This makes sense in most circumstances.

There came a time when the station's ENG operators were no longer required to retain an FCC license because that responsibility would fall to the station's Chief Engineer.

The Chief Engineer was the point person in case any issues arose that concerned the FCC. ENG vehicles would not be a source of interference to a satellite.

That made sense in most circumstances. With Central-casting becoming more prevalent it is likely the Chief Engineer, if there is one, is located in a different part of the country and has no idea the satellite truck is in use or who is operating it.

With the advent of relatively low-cost Satellite News Vehicles and the desire for the stations to cut labor costs the TV stations have lobbied for and received permission from the FCC to not only use low skilled personnel to operate the satellite vehicle but now they don't even have to be inside of the vehicle while it is transmitting.

That person, most likely a photographer, is assigned to go to a location to get a live remote broadcast on the air. He or she is now responsible to operate a satellite truck at the same time and usually in a hurry. It may be cost-effective for the station but neither job is going to get done properly. If they do their photographic job well the satellite uplink job will suffer. It should be a surprise to no one that having a mobile earth station set up and operated by someone who hasn't been in that vehicle for weeks or months could be a potential source of problems. Not only are they away from the vehicle but they will be using their cell phone for communications with the station. The satellite access center would not be able to contact them in the event of a problem. A CID equipped modulator would be useless if there is no way to turn it off.

I've heard that some stations rely on the Auto-Locate function in the antenna controller to acquire the satellite. I know first hand that the Auto-Locater is not reliable. Sometimes it works, sometimes it doesn't. This gets back to proper training. The operator needs to know when the equipment hasn't functioned as expected. If they access the satellite on the correct frequency but on the wrong satellite the likelihood of interference is high. Carrier ID or no the interference has occurred and it was unnecessary.

I'm not saying that all of the interference issues that CID is supposed to eliminate is due the hundreds of TV stations in the country with SNV vehicles. However, it is a concern when as a professional mobile satellite earth station operator I see many feeds pop up on various satellites and many of those don't have the Station call letters in the encoder's SERVICE ID page. The Service ID is there for a reason and it is not being utilized to its fullest extent.

I have had several conversations with satellite access centers such as Intelsat and SES. They were reluctant to point fingers but acknowledged many of the errors associated with a satellite access come from TV stations, not the typical vender satellite companies who access satellites every day.

The operators of many of the affiliate satellite trucks are doing it because their job depends on it. Not because they want to. They can't be expected to be proficient in a job they may do only occasionally and sometimes under duress.

I, like many other satellite venders, are facing increasing competition from cellular bonding technologies as well as fiber optic installations. It seems we are constantly being forced to upgrade our equipment so someone else can make a profit at our expense.

I spent nearly one hundred thousand dollars just a few years ago to upgrade my truck to the latest version of High definition. The equipment supplier did not mention the CID requirement at that time and now I learn none of my four HD encoders and modulators are upgradable.

This could result in a new cost of over a hundred twenty thousand dollars depending on the final upgrade.

This will be a massive hit to my business and there will be no opportunity to recover that expense. It is in effect a tax when there are several steps that could be taken for little or no cost if all of the existing encoders had their owner's Service ID programmed into them. I understand that programming an ID into an encoder is not the same as identifying a carrier but it is something that can be implemented immediately and without a cost to any one. I suggest we start there.

For decades the FCC has been bowing to pressure from the major broadcasters with lobbyists in Washington D.C. to reduce their costs but now the results of those policies are being dropped into the laps of the satellite truck owners. The small owner-operators like myself will be hit especially hard.

In summary, I would encourage you to enact a policy of requiring a usable service ID into all encoders. This would cost nothing and would have an immediate effect.

I believe the policy of un-attended satellite trucks should be revisited. The CID will not operate the truck. It takes a person.

I believe that any encoder and modulator purchased without the option of the CID upgrade should be allowed to operate for a period of ten years from date of purchase. We purchased our equipment in good faith and that should be taken into account.

Respectfully,

David Garbutt  
President and operator  
Wild Hare Satellite, Inc.