

May 4, 2016

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: DA 16-367

ELECTRONICALLY FILED VIA ECFS

To Whom It May Concern:

The Federal Communications Commission has announced plans to implement mandatory Carrier Identification (CID) specifically for temporary-fixed earth stations. The Director of International Bureau waived the CID requirements for one year beginning with the start date, Sept. 3, 2016.

I agree that we should identify ourselves, however, implementing this mandate will force the company I work for (a small business), to incur a tremendous cost that cannot be passed on to our customers. When I access a spacecraft, we are in telephonic communication with the NOC of the satellite's owner. I provide them with their order number and my name and telephone number. In conjunction with the NOC, I perform a number of operations steps in order to insure that my modulated signal will not cause any interference to a adjacent carrier on the same polarity, on the opposite polarity and to adjacent satellites. In case of an anomaly, the NOC can call me with specific instructions. My transmitting equipment is always manned when in operation and can react at a moments notice to follow the NOC's order(s). Further, when my transmission activity has ceased, the antenna is stowed and my TWT amplifiers are shut off, insuring that there could be no instance of satellite interference emanating from my truck.

In order to comply with Section 25.281(b) our company would have to replace all of our current modulators, as they are not upgradable with the new hardware/firmware combination. We have 3 Ku trucks and 1 Ku/C truck. Each has two modulators installed. Our preferred vendor of choice has prepared a quotation for the purchase of nine new modulators (8 active and 1 spare). The base cost of the equipment would be \$91,000. This does not include the time for me to install and confirm their operational status. Our current equipment configuration uses external encoders and external modulators. Should we opt to change to an integrated encoder/modulator combination would probably increase the cost by many thousands of dollars.

It is my feeling and that of many others, that interference caused to satellite carriers is not caused by manned temporary-fixed earth stations, but by those that are unattended including VSAT terminals and unattended and remotely controlled ground stations. There have been quite a few instances of interference being generated by these entities over the past several years.

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Requiring us to upgrade to the required equipment will be very costly, especially since our business segment is slowly being eaten away by fiber optic signal delivery and bonded cellular encoders. To implement this regulation could potentially spell the doom of my company and many others.

I urge you to reconsider implementing Section 24.281(b) or modifying it to exclude manned temporary-fixed earth stations and include VSAT terminals and fixed ground stations.

Thank you for your consideration.

Sincerely,

Alan Maretsky
Engineer/Operator
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