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04 May 2016

Ms. Marlene H. Dortch  
Secretary, Federal Communications Commission  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

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RE: DA 16-367 / IB Docket #12-267  
Response to CID / Section 25.281(b)  
On the matter of Transmitter Identification Requirements For Video Uplink Transmission

Madam Secretary:

Transvision International is a provider of satellite uplink services for live news, sports, and special events, both domestic and international.

With regard to FCC Section 25.281(b), and in particular the pending 'Carrier ID' (CID) requirement, Transvision appreciates the call for public comment and the opportunity to express our concerns.

**1. Purpose of Transmitter Identification for video uplink transmissions:**

No doubt, the purpose of CID is for the satellite carrier to identify the source of an interfering transmitter so that the transmit earth station can be notified post haste to correct the problem. Transvision takes no issue with the need for the satellite carrier to identify and communicate with an offending transmit station.

It is important, however, to point out that the satellite carriers themselves have indicated that the overwhelming majority of interfering transmit stations are those that are either unmanned (V-SATs in particular), or those that are in the control by unqualified operators who access satellites from outside North America. It is my understanding that the proposed CID requirement would NOT apply to these offending earth stations.

The transportable video uplink providers in North America are required to man their respective transmit terminals, and the engineers manning these earth stations are necessarily trained and competent in order for these providers to meet industry standards, and, in order to expect customers to return.

Of note, each time these engineers access with the carrier, they not only go through a "pass/fail" process with the satellite's operational control center, but they also provide the control center with their contact number and company information. Further, most all digital encoders are presently capable of entering service identifications which can be identified by the carrier when the services are not encrypted.

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It is my understanding that the previous uplink identification initiative (ATIS) was welcomed by the satellite carriers, however not required by them. In fact, despite the fact that many companies purchased ATIS hardware, their use has been abandoned altogether. It is my understanding that the satellite carriers are not mandating future use of CID for transportable video uplinks, and that the initiative is being suggested by the FCC in the best interest of the transportable video uplink industry.

## **2. Is the CID initiative in the best interest of the transportable video uplink industry?**

As you will have read from the comments of other providers, transportable uplink operators have been forced to compete against the very low pricing presented by fiber optic transmissions in the past 10 years, and more recently, the even more severe competition from bonded cellular, as well as the spectacular advances in being able to transmit high quality video signals over the internet. While these competing technologies require cellular service or wired connections at the point of origination, transportable uplinks are free of these constraints. Accordingly, transportable uplink serve an important role in responding to disasters where cellular and/or cabled connections are not available. As such, we believe it is in the public interest to maintain a viable transportable uplink industry.

No doubt, cellular and wired service will become for ubiquitous, and will increase the difficulty in running a profitable business for the transportable uplink industry. Engineer wages have gone up; insurance, lodging, licensing, transportation and fuel costs have gone up. But due to the competition, pricing continues to nose dive, and most companies in our industry have had to make cuts and otherwise find ways to compensate for the loss of revenue. No doubt, this is placing many companies in a position where they can no longer survive.

And this now brings us CID initiative, and the further burden that compliance would place on an industry which is already under a lot of financial strain. Whether it is a matter of a (price unknown) software upgrade to equipment that can be upgraded, or in most cases, a replacement altogether (at a minimum of \$10,000 per unit) of equipment which can still be used but is rendered obsolete by virtue of the fact that it cannot be upgraded, there will indeed be a burden to each company. This will range between \$75,000 for smaller companies and \$500,000 for larger companies. Of course, the customers will not agree to an increase in pricing in order to offset the costs of the upgrades or replacement equipment. In an industry that can only hope for 10% to 20% margins, this means that smaller companies must bring in anywhere from \$500,000 to \$750,000 in revenues just to realize enough profit to pay for the CID equipment, and larger companies between \$5M and \$7M. I believe the deleterious consequences are self evident.

Thank you for the opportunity to provide the FCC with some background information which will hopefully be taken into consideration.

Sincerely,

Kimithy Vaughan  
Principal, Transvision International