



May 5, 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 (transportable) earth stations. The Director of International Bureau waived the CID requirements for one year beginning with the start date, Sept. 3, 2016.

Since August of 2013, (UniSat) Universal Satellite Communications, Inc., has attempted to work with several manufactures of satellite encoders/modulators to implement the FCC's proposed new rulemaking, to no avail. Despite promises that existing state-of-the art equipment would be capable of meeting the new digital ATIS requirements, several manufacturers, including ATEME, remain unclear as to why the FCC would require this U.S. domestic-specific mandate. Particularly, since no other country that experiences intentional interference requires the draconian mandate the FCC has proposed.

It is our understanding that the new unfunded mandate is geared towards reducing satellite interference. The FCC has failed to cite specific cases where a transportable earth station (TES) was to blame for incidents of extended intentional inference. If an error is made accessing a satellite, most can be quickly resolved with minimal outage to the affected "service".

It's our belief that the FCC's mandate will actually increase incidents of intentional interference since hundreds of unregulated non ATIS modulators will flood the surplus market. Thus, increasing the likelihood of intentional interference by rogue and terrorist organizations seeking to interfere with domestic and international satellite communications. Some of which are vital to the preservation of life and/ or property.

Therefore, we respectfully request that the FCC extend the moratorium until manufactures, satellite operators and all who rely on communications through these vital channels, can implement an orderly and cost effective solution to meet the FCC's mandate.

Sincerely,

  
Anne Edwardz  
Executive Vice President