

May 6, 2016

To:
Federal Communications Commission
445 12th St SW
Washington DC 20554

From:
Diversified Communications Inc
2000 M St NW
Suite 340
Washington DC 20036

Re: IB Docket 12-267, DA 16-367
Compliance Response of proposed CID Section 25.381(b)

Diversified Communications (DCI) was founded in 1987 and is one of the oldest common-carrier uplink operators in the United States still in operation. Our current fleet of two satellite trucks, two air-transportable uplinks (flyaways) and a 23-antenna teleport would be rendered completely inoperable by the proposed CID rules. Currently NONE of our DVB-S or DVB-S2 modulators are compliant (or upgradable) and replacing every one would cost an estimated \$200,000. As a small independent company operating in an already capitol-intensive industry, compliance with this proposed rule would place a financial burden on our company so large that we would not be able to continue offering satellite uplink services in the United States.

There are few independent teleport operators remaining in the United States, most have been pushed out by large international corporations (such as satellite fleet owners) who have the financial resources to purchase CID-compliant modulators but also support this proposed rule because they know it will force smaller operators to close up shop and therefor reduce competition. Independent teleports are important to the communication infrastructure of the country as we offer a services on a wide range of satellites and fiber networks, where the teleports owned by network operators tend to push clients toward their own networks. Equipment manufacturers who have filed comments in support of this rule have a financial interest in its enforcement, as it would require uplink operators to purchase equipment-equipment that they sell.

Satellite truck operators in the united states are primarily small businesses, running 1-5 trucks and several employees. There are a few large fleet operators who have the budget for a unfunded government mandate such as CID, but the majority of us simply cannot afford to refit all our modulators at once, as this rule would require. Especially considering that nearly all SNG trucks have recently completed upgrading equipment to the current DVB-S2 standard, and this equipment has many more years of useful life and we need to keep running it to recoup our investment. Essentially scrapping otherwise perfectly serviceable equipment- much of it only a few years into a service life that can last 15 or more years- places an undue burden on SNG companies and other satellite service providers.

The CID rule has the noble goal of reducing and identifying interference, however a majority of satellite interference does not come from unintentional accesses from SNG trucks and teleports, it comes from mispointed VSAT systems, which are exempt from CID, and even intentional unapproved access, which is more common in South America and generally rare on US domestic satellites. CID

would have no deterrent on the later, and would not even apply to the former. Instead occasional use operators such as SNG trucks and teleports would be forced to equip with CID at great expense, even though they are not the primary source of satellite interference.

The CID rule would not be in the public interest, as it would force many companies out of business. It would restrict access to satellite services- including emergency communications restoration, disaster recovery, telemedicine, live coverage of news, and many other valuable public services that independent satellite uplink operators provide.

As a small business employing 8 full time employees and many freelancers whose jobs would be threatened by this proposal, DCI requests that the International Bureau reconsiders the rule making CID mandatory.

Robert Zajko
Diversified Communications, Inc

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