



June 8, 2016

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Notice of Oral *Ex Parte* - Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, GN Docket No. 14-177

Dear Ms. Dortch:

On June 6, 2016, representatives of the Satellite Industry Association (“SIA”)¹ met with Commissioner O’Rielly and Robin Colwell to discuss the above referenced proceeding.

In the meeting, SIA expressed concern over the potential for harmful aggregate UMFU interference towards FSS space stations that are currently protected under co-primary status under U.S. and International Tables of Frequency Allocations. UMFU aggregate interference could also impact non-U.S. licensed FSS satellites, thereby affecting

¹ SIA is a U.S.-based trade association providing representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. Since its creation twenty years ago, SIA has advocated on behalf of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business. SIA Executive Members include: The Boeing Company; The DIRECTV Group; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado Networks; Lockheed Martin Corporation; Northrop Grumman Corporation; OneWeb; SES Americom, Inc.; Space Exploration Technologies Corp.; SSL; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Artel, LLC; COMSAT Inc.; DigitalGlobe Inc.; DRS Technologies, Inc.; Eutelsat America Corp.; Global Eagle Entertainment; Glowlink Communications Technology, Inc.; Hughes; iDirect Government Technologies; Inmarsat, Inc.; Kymeta Corporation; O3b Limited; Panasonic Avionics Corporation; Planet Labs Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; and XTAR, LLC.

U.S. treaty obligations, even though they may not be serving the U.S. These FSS space stations should be protected from the likely aggregate interference, particularly in the absence of FCC codification into the rules of the technical power levels permitted towards the sky from UMFU systems.

SIA also noted that establishing FSS earth stations as co-primary status in the 28 GHz band is necessary to move forward on technical discussions with terrestrial providers in sharing of the band. It was also important to identify the need to grandfather as co-primary both currently licensed FSS earth stations as well as new FSS earth stations licensed, or for which applications are filed before any reauthorization of LMDS and before the UMFU auction and thereafter permitting FSS earth stations to be co-primary and as needed under safe harbor rules. SIA discussed the impracticality of requiring numerous and often competitive FSS earth stations with a diversity of tracking requirements and customers to co-locate. Such an action would be wrought with complications over zoning, access to fiber, or other practical and technical concerns.

With regards to the 37/39 GHz bands, SIA noted the record is incomplete with respect to spectrum sharing measures and other regulatory requirements for receive-only earth stations and UMFU to operate on a shared basis. The FCC should seek further comment before adopting regulatory provisions in these bands.

SIA is committed to finding a solution to sharing the 28 GHz band with terrestrial providers. However, a common understanding and agreement of FSS space and earth stations as co-primary status is needed to move forward with detailed technical solutions for spectrum sharing with UMFU, and more information should be sought with regard to the 37/39 GHz bands before moving forward.

Attending on behalf of SIA were: Tom Stroup (SIA), Charity Weeden (SIA), Mariah Shuman (O3b), Scott Kotler (Lockheed Martin), Bruce Olcott (Jones Day for Boeing), Thomas Tycz (Goldberg, Godles, Wiener & Wright, LLP for Iridium), Giselle Creeser (Inmarsat), Kalpak Gude (OneWeb), Chris Murphy (Viasat), Nancy Eskenazi (SES), Cynthia Grady (Intelsat), Robert Koppel (Lukas Nace for Kymeta), Stacy Fuller (DIRECTV), Jennifer Manner (Echostar), Patricia Cooper (SpaceX), and Suzanne Malloy (O3b).

Respectfully submitted,

SATELLITE INDUSTRY ASSOCIATION

By: /s/ Tom Stroup

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