Before the
**Federal Communications Commission**
Washington, D.C. 20554

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| In the Matter of | ) | |
| | ) | |
| Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band | ) | PS Docket No. 06-229 |
| | ) | WT Docket No. 96-86 |
| Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010 | ) | |

## REPLY COMMENTS OF THE SATELLITE INDUSTRY ASSOCIATION

The Satellite Industry Association ("SIA") offers reply comments in response to the FCC Ninth Notice of Proposed Rulemaking issued on January 10, 2007 ("9th NPRM"), seeking comment on proposals for implementation of a nationwide, interoperable, broadband public safety network in the 700 MHz band.

SIA is a U.S.-based trade association providing worldwide representation of the leading satellite operators, service providers, manufacturers, launch services providers, remote sensing operators, and ground equipment suppliers. SIA is the unified voice of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business.[1]

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[1] SIA Executive Members include: Arrowhead Global Solutions Inc.; Artel Inc.; The Boeing Company; Datapath, Inc., The DIRECTV Group; Globalstar, Inc; Hughes Network Systems LLC; ICO Global Communications; Integral Systems, Inc.; Intelsat, Ltd.; Iridium Satellite LLC; Lockheed Martin Corp.; Loral Space & Communications Inc.; Mobile Satellite Ventures LP; Northrop Grumman Corporation; SES Americom, Inc.; and TerreStar Networks Inc.; and Associate Members include: ATK Inc.; EchoStar Satellite LLC; EMC Inc.; Eutelsat

SIA supports the goal of providing broadband communications capabilities to our nation's first responder personnel, and believes that satellite communications must play an essential role in meeting this goal. Our Nation's emergency responders need a communications architecture that will provide operability day-to-day and interoperability when needed in response to NS/EP events.

Emergency responders have long been aware of the interoperability problems associated with the current patchwork of conflicting standards that hinder their relief efforts. The rapid evolution of communications technology, with the variety and increasing number of threats, requires the reassessment of policy to assure readiness and functionality for future crises. A comprehensive approach aimed at formulating a sound and sensible emergency communications strategy is needed to bring 21st century communications capabilities to the public safety community, in a way that maintains focus on the challenges of incorporating existing equipment and practices into a constantly changing technological and cultural environment. The inability to connect multiple communications plans and architectures clearly has impeded coordination and communication at the Federal, State, and local levels in the past, and a proactive approach that recognizes and seeks to navigate around the same pitfalls will be critical to avoiding these same types of adverse consequences in the future.

Considering the high stakes involved with emergency communications, the need for a unified national emergency communications system, plan, process, and strategy to account for and mitigate the impact of massive communications infrastructure damage, including the destruction of telephone lines, public safety networks, cellular towers, and sustained loss of power, remains paramount. The Department of Homeland Security (DHS) has also identified communications interoperability as one of the key national priorities for first responders to

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Inc.; Inmarsat Inc.; IOT Systems; Marshall Communications Corp.; SES New Skies; Spacecom Corp.; Stratos Global Corp; and SWE-DISH Space Corp.

achieve the National Preparedness Goal and has identified interoperable communications as an essential target capability needed to respond to a major event.[2]

Commercial satellite communications networks play a significant role in making the global telecommunications infrastructure robust enough to sustain major outages as a result of natural or man-made disasters. Emergency responders and public safety officials rely on satellite communications before, during, and after disasters, often serving as the only means of reliable, redundant, and ubiquitous communications during times of emergency. We also provide important satellite services, including voice, video, data, radio and broadband services to Americans who live in rural and remote portions of the country.

SIA believes that a satellite component is essential to a nationwide public safety network to ensure the network has the resiliency and redundancy capable of withstanding near-total network annihilation, as was the case with Hurricane Katrina. Satellite communications can provide backup communications for emergency purposes by extending the IP backbone to the scene of the incident, and providing connectivity for deployable networks when existing terrestrial infrastructure is not available. Emergency communications networks must include some form of satellite communication capability in order to be fully resilient and redundant. Satellite systems cover vast regions, and are immune from earthquakes, hurricanes, and most terrorist attacks. Thus, they play an important role when terrestrial systems have been destroyed by a disaster and in sparsely populated areas where terrestrial coverage is unavailable or too expensive to be widespread.

Satellites currently provide essential, ubiquitous and resilient nationwide emergency communications capabilities that, for public safety reasons, must be a required element of the

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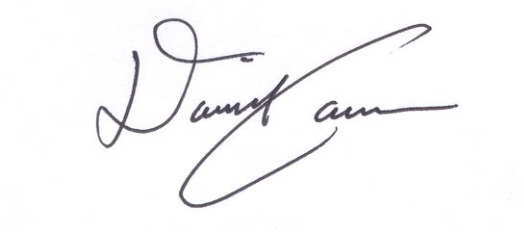
[2] The National Preparedness Goal guides Federal departments and agencies, State, territorial, local and tribal officials, the private sector, non-government organizations and the public in determining how to most effectively and efficiently strengthen preparedness for terrorist attacks, major disasters, and other emergencies. *The Department of Homeland Security's Interim National Preparedness Goal, Homeland Security Presidential Directive 8: National Preparedness, March 31, 2005.*

public safety network. SIA and its members look forward to advising the Commission and the public safety community on integrating mobile and fixed satellite services into the national emergency communications network.

Respectfully submitted,
SATELLITE INDUSTRY ASSOCIATION



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March 12, 2007