



July 24, 2013

FILED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street N.W.
Washington, D.C. 20544

Re: ET Docket 13-49
Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band

Dear Ms. Dortch:

The Satellite Industry Association (“SIA”)¹ strongly endorses the comments and reply to comments filed by SES S.A. (“SES”) and Intelsat S.A. (“Intelsat”) in the above-captioned proceeding.²

SIA represents more than 40 leading satellite companies, many of whom manufacture or operate satellites and ground equipment in the 5.85-5.925 GHz band (“5.9 GHz band”), or provide services using these frequencies. SIA is deeply concerned

¹ SIA is a U.S.-based trade association providing worldwide representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. Since its creation more than eighteen years ago, SIA has advocated for the unified voice of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business. For more information, visit www.sia.org. SIA Executive Members include: Artel, LLC; The Boeing Company; The DIRECTV Group; EchoStar Satellite Services LLC; Harris CapRock Communications; Hughes Network Systems, LLC; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; LightSquared; Lockheed Martin Corporation.; Northrop Grumman Corporation; Rockwell Collins Government Systems; SES Americom, Inc.; and SSL. SIA Associate Members include: AIS Engineering, Inc.; Astrium Services Government, Inc.; ATK Inc.; Cisco; Cobham SATCOM Land Systems; Comtech EF Data Corp.; DRS Technologies, Inc.; Encompass Government Solutions; Eutelsat, Inc.; Globecom Systems, Inc.; Inmarsat, Inc.; ITT Exelis; Marshall Communications Corporation.; MTN Government Services; NewSat America, Inc.; O3b Networks; Orbital Sciences Corporation; Panasonic Avionics Corporation; Spacecom, Ltd.; Row 44; Spacenet Inc.; TeleCommunication Systems, Inc.; Telesat Canada; The SI Organization, Inc.; TrustComm, Inc.; Ultisat, Inc.; ViaSat, Inc., and XTAR, LLC.

² *Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, Notice of Proposed Rulemaking, ET Docket No. 13-49, FCC 13-22 (rel. Feb. 20, 2013) (“Notice”).

that neither the Commission nor any parties to this proceeding have provided any technical analysis to demonstrate that Unlicensed National Information Infrastructure (“U-NII”) devices can operate with primary, licensed services in the 5.9 GHz band without causing excessive or harmful levels of in-band and out-of-band interference. All commenters agree that primary services need to be protected from interference, but none have demonstrated how this can be realistically achieved given the demand for unconstrained indoor and outdoor deployment of U-NII devices. In fact, the technical analysis submitted by two members of SIA – SES and Intelsat – in their reply comments to the Commission demonstrates that only a few thousand U-NII devices operating in the 5.9 GHz band would cause excessive interference into primary Fixed Satellite Service (“FSS”) uplinks. And if past and predicted Wi-Fi deployments are any guide, then the deployment of hundreds of millions of U-NII devices in the 5.9 GHz band would cause harmful interference and disrupt satellite uplinks in this band that are used to provide a wide range of services between the U.S. and foreign points. The impact of such widespread U-NII deployments upon U.S. satellite services in the adjacent 5925-6425 MHz band must also be studied.

For these reasons, SIA agrees with SES and Intelsat that moving forward with this proposal would be inappropriate and premature. Accordingly, SIA urges the Commission to remove the 5.9 GHz band from further consideration in this proceeding.

Please contact Patricia Cooper or Sam Black if you have any questions.

Respectfully submitted,

SATELLITE INDUSTRY ASSOCIATION

A handwritten signature in black ink, appearing to read "Patricia Cooper". The signature is fluid and cursive, written in a professional style.

Patricia Cooper, President
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U.S.A.