

August 2, 2013

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

**Re: *Ex Parte* Notice, Comprehensive Review of Licensing and Operating Rules for Satellite Services, IB Docket No. 12-267**

Dear Ms. Dortch:

On August 2, 2013, the undersigned left voicemails with: (1) Louis Peraertz of Acting Chairwoman Clyburn's office; (2) Matthew Berry of Commissioner Pai's office; and (3) Priscilla Delgado Argeris of Commissioner Rosenworcel's office regarding the above proceeding. Specifically, the voicemails noted our interest in this proceeding, and agreement with the earlier comments filed by NCTA which expressed support for revisions to the Commission's Automatic Transmitter Identification System ("ATIS") rules while recognizing the need for a sufficient phase-in period which takes account of the normal life cycle of uplink equipment.

To the extent that the Commission may adopt a relatively short phase-in period (such as two years) for uplink operators to implement the new Digital Video Broadcasting Project ("DVB") Carrier ID system, it would not present a problem for newly-acquired equipment or already-deployed transmitters whose modulators are capable of being upgraded via software. As such, we would support such a requirement for equipment of this type.

Other legacy equipment, including facilities using QPSK modulation technology, cannot be upgraded to the new DVB system and would thus necessitate wholesale equipment replacement at both transmit and receive sites. The cost and potential for service disruption associated with such replacement would be significant – hundreds of millions of dollars aggregated across the entire cable television industry – with no commensurate benefit in terms of interference mitigation. The uplink facilities operated by cable programmers are carefully managed in well-established locations pursuant to their FCC licenses. The risk of interference caused by these facilities is extremely low and, in any event, would be easily identifiable if present given the static nature of these sites. As such, there would be no advantage gained by replacing these facilities before the



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end of their normal life cycle, and the Commission should therefore grandfather any uplink facilities which cannot be upgraded via software to the new DVB system.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS, and a copy will be provided via email to the individuals listed below. Please contact me if you have any questions regarding this notice.

Sincerely,

A handwritten signature in black ink, appearing to read "S.A. Mort", with a long, sweeping horizontal line extending to the right.

Susan A. Mort

cc: Louis Peraertz  
Matthew Berry  
Nicholas Degnani  
Priscilla Delgado Argeris