Please Do Not Reply To This Email.

Public Comments on Federal Earth Stations and Non-Federal Fixed Satellite Service Space Stations: Spectrum for Non-Federal Space Launch Operations:========

Title: Federal Earth Stations and Non-Federal Fixed Satellite Service Space Stations: Spectrum for Non-Federal Space Launch Operations

FR Document Number: 2013-15592

RIN:

Publish Date: 7/1/2013 12:00:00 AM

Submitter Info:

First Name: Dan

Last Name: Hendrickson

Mailing Address: 1000 Wilson Blvd., Suite 1700

City: Arlington

Country: United States

State or Province: VA

ZIP/Postal Code: 22209

Email Address: daniel.hendrickson@aia-aerospace.org

Organization Name: Aerospace Industries Association

Comment: The following submission is from the Aerospace Industries Association (AIA) – an organization that, since 1919, has provided the perspectives of the U.S. Aerospace Industry to our nation's decision makers. AIA's membership includes more than 350 companies, comprising over 90% of U.S. aerospace sales, ranging from small, 3rd and 4th tier suppliers to multibillion dollar systems integration contractors. AIA's Space Council – representing the 50 AIA companies most involved in space programs - developed this input using a consensus based process. AIA's Space Council includes both established firms as well as new entrants; a list of AIA Space Council member companies is

provided below. We welcome the opportunity to respond to this comment, and would be pleased to respond to any questions the FCC may have.

AIA Member List:

Aerojet Rocketdyne

American Pacific

AMT II

Analytical Graphics

ATK

BAE Systems

Ball Aerospace

B&E Group

The Boeing Company

Broad Reach

Certon Software

Cobham

CSC

DigitalGlobe

Ducommun

General Dynamics

General Electric

Goodrich

Harris

Hi-Shear

Honeywell

IBM

ITT Exelis

L-3 Communications

Lockheed Martin

Marotta Controls

Micro-Coax, Inc.

MOOG

NobleTek

Northrop Grumman

The Padina Group

Pacifica Engineering

Parker Aerospace

PwC

Raytheon

Realization Technologies

Rolls-Royce North America

SAIC

Seal Science

Siemens PLM Software

Sierra Nevada Space Systems

SpaceX

SRA International

Textron

Timken

Virgin Galactic

United Technologies Corporation

Response to FCC Note of Proposed Rule Making:

Federal Earth Stations and Non-Federal Fixed Satellite Service Space Stations: Spectrum for Non-Federal Space Launch Operations

August 30, 2013

For nearly 30 years, the domestic commercial space launch service industry has invested billions of dollars to meet the needs of government and commercial users. Today, as U.S. firms work to regain and grow commercial market share in a business dominated by foreign providers, it is important that U.S. regulatory agencies facilitate the growth of the domestic U.S. space launch industry by streamlining and enhancing the regulatory process surrounding access to spectrum. Making the spectrum available is only the first step, providing an efficient process and tools to access and manage that process are essential. Allowing launch providers to participate in the process will result in a more user friendly and efficient outcome.

AIA appreciates the FCC's goal to provide streamlined, predictable spectrum licensing and initiate discussion as to what steps are appropriate and necessary for the FCC to take to support the continued development of the commercial space industry. Minimizing business uncertainty, and more specifically, reducing uncertainty in terms of timing of approval prior to scheduled launch date as well as interference protection status should be an aim of the Commission. Reducing uncertainties, streamlining processes, and maintaining security of access to spectrum reduces costs, increases safety and can facilitate industry success.

The Commission, Federal users, satellite providers, and commercial launch service providers should work together to simplify the spectrum access process with incentives to users to maximize efficiency and spectrum availability. AIA however, does not support the Commission's proposal to utilize three frequencies in the 2360-2396 MHz band for commercial space launch operations, as this would both disrupt the current economies of scale across Federal and non-Federal launch services and require massive new expenditures to change radios and supporting ground systems. Given the highly-competitive, international market, increasing costs for U.S. launch service providers is not a viable option.

The FCC raised the question as to whether it should seek a co-primary non-Federal allocation within the 420-430 MHz, 5650-5925 MHz and 2200-2290 MHz bands. Regarding both the 420-430 MHz and 5650-5925 MHz bands, AIA sees no need for co-primary, non-Federal allocation. With respect to the 420-430 MHz band, the Federal range has the responsibility for the safety aspect of use of this band, and thus no need for non-Federal allocation. With respect to the 5560-5925 MHz, this band is allocated for radar tracking from the Federal launch range, managed by the range; AIA does not consider there to be any need for a non-Federal allocation in this band either. The AIA membership is discussing the FCC proposal for the 2200-2290 MHz band and will update the commission as warranted.

Finally, AIA believes the Commission should define commercial launches as those launches licensed by the FAA under the Commercial Space Launch Act (CSLA). The CSLA defines a commercial provider as an entity conducting a launch by someone other than the Federal, state, or local government. Those launches not licensed by the FAA should therefore not be subject to any licensing requirements developed by the FCC.

The following submission is from the Aerospace Industries Association (AIA) – an organization that, since 1919, has provided the perspectives of the U.S. Aerospace Industry to our nation's decision makers. AIA's membership includes more than 350 companies, comprising over 90% of U.S. aerospace sales, ranging from small, 3rd and 4th tier suppliers to multibillion dollar systems integration contractors. AIA's Space Council – representing the 50 AIA companies most involved in space programs - developed this input using a consensus based process. AIA's Space Council includes both established firms as well as new entrants; a list of AIA Space Council member companies is provided below. We welcome the opportunity to respond to this comment, and would be pleased to respond to any questions the FCC may have.

AIA Member List:

Aerojet Rocketdyne

American Pacific

AMT II

Analytical Graphics

ATK

BAE Systems

Ball Aerospace

B&E Group

The Boeing Company

Broad Reach

Certon Software

Cobham

CSC

DigitalGlobe

Ducommun

General Dynamics

General Electric

Goodrich

Harris

Hi-Shear

Honeywell

IBM

ITT Exelis

L-3 Communications

Lockheed Martin

Marotta Controls

Micro-Coax, Inc.

MOOG

NobleTek

Northrop Grumman

The Padina Group

Pacifica Engineering

Parker Aerospace

PwC

Raytheon

Realization Technologies

Rolls-Royce North America

SAIC

Seal Science

Siemens PLM Software

Sierra Nevada Space Systems

SpaceX

SRA International

Textron

Timken

Virgin Galactic

United Technologies Corporation

Response to FCC Note of Proposed Rule Making:

Federal Earth Stations and Non-Federal Fixed Satellite Service Space Stations: Spectrum for Non-Federal Space Launch Operations

August 30, 2013

For nearly 30 years, the domestic commercial space launch service industry has invested billions of dollars to meet the needs of government and commercial users. Today, as U.S. firms work to regain and grow commercial market share in a business dominated by foreign providers, it is important that U.S.

regulatory agencies facilitate the growth of the domestic U.S. space launch industry by streamlining and enhancing the regulatory process surrounding access to spectrum. Making the spectrum available is only the first step, providing an efficient process and tools to access and manage that process are essential. Allowing launch providers to participate in the process will result in a more user friendly and efficient outcome.

AIA appreciates the FCC's goal to provide streamlined, predictable spectrum licensing and initiate discussion as to what steps are appropriate and necessary for the FCC to take to support the continued development of the commercial space industry. Minimizing business uncertainty, and more specifically, reducing uncertainty in terms of timing of approval prior to scheduled launch date as well as interference protection status should be an aim of the Commission. Reducing uncertainties, streamlining processes, and maintaining security of access to spectrum reduces costs, increases safety and can facilitate industry success.

The Commission, Federal users, satellite providers, and commercial launch service providers should work together to simplify the spectrum access process with incentives to users to maximize efficiency and spectrum availability. AIA however, does not support the Commission's proposal to utilize three frequencies in the 2360-2396 MHz band for commercial space launch operations, as this would both disrupt the current economies of scale across Federal and non-Federal launch services and require massive new expenditures to change radios and supporting ground systems. Given the highly-competitive, international market, increasing costs for U.S. launch service providers is not a viable option.

The FCC raised the question as to whether it should seek a co-primary non-Federal allocation within the 420-430 MHz, 5650-5925 MHz and 2200-2290 MHz bands. Regarding both the 420-430 MHz and 5650-5925 MHz bands, AIA sees no need for co-primary, non-Federal allocation. With respect to the 420-430 MHz band, the Federal range has the responsibility for the safety aspect of use of this band, and thus no need for non-Federal allocation. With respect to the 5560-5925 MHz, this band is allocated for radar tracking from the Federal launch range, managed by the range; AIA does not consider there to be any need for a non-Federal allocation in this band either. The AIA membership is discussing the FCC proposal for the 2200-2290 MHz band and will update the commission as warranted.

Finally, AIA believes the Commission should define commercial launches as those launches licensed by the FAA under the Commercial Space Launch Act (CSLA). The CSLA defines a commercial provider as an entity conducting a launch by someone other than the Federal, state, or local government. Those launches not licensed by the FAA should therefore not be subject to any licensing require