



November 18, 2013

**FILED ELECTRONICALLY**

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

**Re: Notice of *Ex Parte* Presentation – GN Docket No. 13-114, RM-11640  
*Expanding Access to Broadband and Encouraging Innovation through Establishment of an Air-Ground Mobile Broadband Secondary Services for Passengers Aboard Aircraft in the 14.0-14.5 GHz Band***

Dear Ms. Dortch:

On November 14, 2013, representatives of the Satellite Industry Association (“SIA”)<sup>1</sup> met with a number of Federal Communications Commission (“FCC” or “Commission”) staff to discuss satellite industry’s views on the Commission’s proposal

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<sup>1</sup> 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](http://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.; DigitalGlobe; DRS Technologies, Inc.; Encompass Government Solutions; Eutelsat, Inc.; Globecom Systems, Inc.; Inmarsat, Inc.; ITT Exelis; Marshall Communications Corporation.; MTN Government; NewSat America, Inc.; O3b Networks; Orbital Sciences Corporation; Panasonic Avionics Corporation; Row 44, Inc.; Spacecom, Ltd.; Spacenet Inc.; TeleCommunication Systems, Inc.; Telesat Canada; The SI Organization, Inc.; TrustComm, Inc.; Ultisat, Inc.; ViaSat, Inc., and XTAR, LLC.

to implement a proposal by Qualcomm Incorporated (“Qualcomm”) for a new, secondary Aeronautical Mobile Service in the 14.0-14.5 GHz band (the “AMS NPRM”). The written presentation used by the SIA representatives in the meeting is included as an annex to this submission.

SIA representatives met with the following Commission staff: Jim Ball, Howard Griboff, B.K. Yi, Kate Collins, and Sean O’More, all of the International Bureau. The following SIA representatives attended the meeting in person: Sam Black, SIA; Susan Crandall, Intelsat; Catherine DePeuter, Intelsat; Daniel Mah, SES; Daryl Hunter, ViaSat; Steven Doiron, EchoStar; David Keir, Lerman Senter (representing Row 44); and Alan Rinker, Boeing. Additionally, Richard Barnett of Telecomm Strategies (representing SES), John Forsey of Telesat, and Roya Shambayati of Intelsat participated by phone.

During the meeting, the SIA representatives presented a review of the engineering analyses of the AMS NPRM on the record, as well as some new data to amplify and expand upon the satellite industry concerns that have been documented in the record before the Commission.

The SIA representatives reiterated that in order to protect the Fixed Satellite Service (“FSS”), which is a primary allocation in the 14.0-14.5 GHz band, the International Telecommunications Union (“ITU”) has established that the aggregate interference from all non-primary services should not cause more than a 1% Rise-over-Thermal into the primary FSS.<sup>2</sup> As a result, if the Commission were to decide to proceed with a secondary AMS allocation, it should not allocate the entire 1% to that single secondary service. Instead, given the other secondary services already in the band, and the realistic possibility of at least one future secondary service (either within the United States or in neighboring countries), the proposed AMS should be allotted only a third of that budget. Such apportionment is consistent with positions taken by the U.S. at the ITU.<sup>3</sup>

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<sup>2</sup> See ITU-R Recommendation S.1432, [http://www.itu.int/dms\\_pubrec/itu-r/rec/s/R-REC-S.1432-1-200601-I!!PDF-E.pdf](http://www.itu.int/dms_pubrec/itu-r/rec/s/R-REC-S.1432-1-200601-I!!PDF-E.pdf).

<sup>3</sup> See, e.g., United States of America, Contribution Document 336-E to JTG 4-5-6-7, "In-band and adjacent band compatibility studies between IMT-Advanced systems and fixed satellite service receive earth stations operating in the C-band," at 2-3 (Oct. 11, 2013). In this document, the United States performed compatibility studies based on an apportionment of the interference allowance from Recommendation ITU-R S.1432 among proposed and existing service allocations in the C-band. This is similar to the approach SIA is advocating for the 14 GHz band, but taking into account the different allocations in the different frequencies.

The SIA representatives also discussed a number of technical issues related to the protection of current and future geostationary FSS satellites, as well as potential future non-geostationary FSS systems.

Finally, the SIA representatives reviewed the licensing and enforcement considerations that the Commission will need to address in order to accomplish its stated goal of protecting primary FSS in the band from harmful interference.

A copy of this notice and attachment is being emailed to the Federal Communications Commission staff identified below. Please contact Patricia Cooper if you have any questions.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION



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U.S.A.

Attachment  
cc (via email):

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Howard Griboff, International Bureau  
B.K. Yi, International Bureau  
Kate Collins, International Bureau  
Sean O'More, International Bureau