

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC**

In the Matter of )  
 )  
Recommendations Approved By The ) IB Docket No. 04-286  
Advisory Committee For The 2015 World )  
Radiocommunication Conference )

**COMMENTS OF THE SATELLITE INDUSTRY ASSOCIATION**

The Satellite Industry Association (“SIA”) hereby responds to the Federal Communications Commission’s (“Commission” or “FCC”) request for comments on the draft recommendation, WAC/099(17.12.14), provided by the Advisory Committee for the 2015 World Radiocommunication Conference (“WRC-15 Advisory Committee” or “WAC”) on Agenda Item 1.1.

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 almost twenty 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.<sup>1</sup>

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<sup>1</sup> SIA Executive Members include: The Boeing Company; The DIRECTV Group; EchoStar Corporation; Harris CapRock Communications; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; LightSquared; Lockheed Martin Corporation; Northrop Grumman Corporation; SES Americom, Inc.; SSL; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Airbus DS SatCom Government, Inc.; Artel, LLC; ATK Inc.; Cisco; Cobham SATCOM Land Systems; Comtech EF Data Corp.; DRS Technologies, Inc.; Eutelsat America Corp.; Glowlink Communications Technology, Inc.; Hughes; iDirect Government Technologies; Inmarsat, Inc.; Exelis, Inc.; Marshall Communications Corporation.; MTN Government; O3b Limited; Orbital Sciences Corporation; Panasonic Avionics Corporation; Row 44, Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; Vencore Inc.; and XTAR, LLC.

On December 17, 2014, the WAC approved draft recommendations with respect to several items on the agenda of the 2015 World Radiocommunication Conference (“WRC-15”) and provided these recommendations for consideration by the FCC. Because members of IWG-2 were unable to reach consensus on a common proposal, WAC/099(17.12.14) contains two differing views. SIA strongly supports the WAC’s View A, which calls for the United States to propose no changes (“NOC”) to the WRC-15 Agenda Item 1.1 for the frequency bands 3400-4200 MHz and 4500-4800 MHz. SIA urges the Commission to recommend this View in WAC/099(17.12.14).

**I. THE FCC SHOULD SUPPORT VIEW A (NO CHANGE) TO AGENDA ITEM 1.1 FOR FREQUENCY BANDS 3400-4200 MHz AND 4500-4800 MHz.**

SIA, as a contributing WAC member, supports View A in WAC/099(17.12.14), which calls for the United States to propose no changes (NOC) to WRC-15 under Agenda Item 1.1 for the frequency bands 3400-4200 MHz and 4500-4800 MHz (C-band spectrum).

The fixed-satellite service (“FSS”) makes extensive use of the C-band in the United States and globally in order to provide video distribution, mobile voice and data backhaul services, aeronautical applications, and many others, to commercial customers. Spectrum in the C-band has unique attributes among the spectrum to which satellite operators have access – most notably wide coverage and resistance to rain fade – such that migration of these services to other bands is not possible without accepting significant coverage reduction or service quality degradation. These unique qualities have made the C-band attractive to users within U.S. Department of Defense (“DoD”) and other national security and public safety user communities, among others. DoD users alone acquired an average of more than 800 MHz of commercial C-band satellite spectrum per year from commercial satellite operators between 2005 and 2010.

Due the important services that are provided using C-band spectrum, there are more than 150 commercial satellites that operate in these bands today, and numerous additional such satellites are under construction. These satellites alone represent tens of billions of dollars in investment, not taking into account the extensive investment in terrestrial infrastructure that relies on C-band for service offerings to consumers and end users throughout the world.

SIA is very concerned that the introduction International Mobile Telecommunications (“IMT”) into the C-band, as envisioned by View B, could cause excessive levels of harmful interference into C-band satellite services, precluding future use of this band by the satellite industry, and stranding the extensive on-orbit and terrestrial infrastructure that exists today. As such, the United States must propose no changes (NOC) to WRC-15 under Agenda Item 1.1 in order to protect continued access for these critical and highly reliable satellite services.

## **II. U.S. DOMESTIC USE IS UNIQUE AND SHOULD NOT DRIVE INTERNATIONAL POLICY**

As View A correctly notes, U.S. domestic use of the C-band is unique, and therefore should not drive global policymaking. In the United States, the FSS has extremely limited access to the 3400-3700 MHz band, whereas usage of the 3700-4200 MHz for the FSS is extensive. By contrast, in most other administrations there is little or no differentiation between satellite usage of the 3400-3700 and 3700-4200 MHz bands. The unique usage characteristics of the 3400-3700 MHz band in the United States has led to the consideration of novel sharing proposals for this band at the Commission. However, there is no consensus on what technical and regulatory mechanisms for the protection of the satellite earth stations in this band would be sufficient, and many other portions of the sharing proposal are subject to debate. Therefore, SIA strongly

believes that it is premature to let an ongoing domestic rulemaking proceeding that is confined to a small portion of the C-band drive U.S. policy at an international forum for the entire band.

### **III. CONCLUSION**

For the above reasons, and those outlined in the Attachment to View A, SIA supports the draft proposal for NOC under Agenda Item 1.1 and urges the Commission to support the proposal in WRC-15 Advisory Committee's View A, WAC/099(17.12.14). SIA urges the Commission to take the above comments into account to ensure current and future protection of incumbent satellite services in the bands 3400-4200 MHz and 4500-4800 MHz by supporting View A in WAC/099(17.12.14).

Respectfully submitted,

/s/

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