

CBA Reply to the FCC Public Notice Regarding Other Proposals – Fact Sheet



On August 14, the C-Band Alliance (“CBA”) provided Replies to previously filed Comments on a Public Notice issued July 19, 2019 by the U.S. Federal Communications Commission (FCC). The record confirms what has been evident from the beginning: the fastest and most efficient way to reallocate the C-band while protecting existing services is to adopt a market-based solution led by satellite operators.

Peter Pitsch, C-Band Alliance Head of Advocacy and Government Affairs said, *“Our Reply Comment documents the numerous timing, technological and legal flaws that various stakeholders have identified in the “not ready for prime time” ACA Connects Coalition proposal. It also builds on our previously filed technical analysis that rigorously demonstrates what operating parameters will foster efficient 5G deployment without risking harmful interference to our customers. Overall, the record demonstrates that the C-Band Alliance proposal best achieves the FCC’s objective of expeditiously clearing spectrum for 5G while also protecting the valuable incumbent services in the C-band.”*

Comments and Replies to the ACA Connects Coalition (“ACACC”) Proposal

- The record confirms that the ACACC greatly underestimates the complexity of, and time involved in, replacing the bulk of the current U.S. content distribution architecture with fiber. August 7 comments included:
 - The **“Content Owners”**¹ stated, “the ACA Connects Coalition proposal underestimates the complexity, timing, reliability challenges, and cost that would arise from an attempt to change the video distribution infrastructure from one based primarily on satellite to one based mostly on fiber.”
 - The **National Association of Broadcasters** indicated, “While C-band’s one-to-many architecture is perfectly suited for the nationwide distribution of content, particularly in rural areas, fiber’s point-to-point architecture will require content providers to fit a square peg into a round hole.”
 - **AT&T** stated, “Most importantly, the ACA/CCA/Charter proposes to impose one technical solution—fiber—for an entire industry—the video content programming and distribution sector. No subset of stakeholders—whether earth station operators, terrestrial facilities owners, or satellite service providers—should force technology choices upon the entire ecosystem.”
 - Other C-band users indicating that a fiber-based solution such as the ACACC proposal would not be a suitable or acceptable replacement for the current C-band distribution environment included **QVC, HSN, Cumulus Media Inc., Westwood One, PSSI Global Services, LinkUp Communications, Globecast, Riverfront Broadcasting and the Alaska Telecom Association.**
- Many agree with the CBA’s view that the ACACC proposal cannot be accomplished in 18 months, and would be fraught with implementation, cost and on-going operational risks. August 7 comments included:
 - **QVC and HSN** indicated the ACACC proposal failed to account for the time it takes to design, test and build a network.
 - The **Content Owners** confirmed that the transition proposed would more likely take anywhere from “at least five years in a best-case scenario” to “more than a decade.”
 - **Cumulus and Westwood One** indicated that the thousands of miles of new, redundant fiber needed to be deployed to connect programmers to headends would be “astronomical.”
- Last, neither the ACACC nor its allies refuted the careful legal analysis conducted by the CBA which indicates that adoption of the ACACC proposal would run afoul of the U.S. Constitution and the Communications Act. Parties agreeing with the CBA’s legal analysis in the August 7 Comments included Verizon and the group filing as the Small Satellite Operators.

¹ A group comprised of CBS, Discovery, Disney, Fox, Univision and Viacom.

Comments and Replies Regarding a Point to Multi-point (“P2MP”) Study (the “Reed Study”)

The CBA and many other parties have repeatedly explained that the costs of introducing new P2MP operation in the C-Band far outweigh any potential benefits. The risks include disruption of critical satellite operations and delay of any chance of future spectrum clearing for 5G use as compression and video distribution technologies evolve over time.

- The record confirms that the P2MP Reed Study is flawed and thus its conclusions are invalid. The **Satellite Industry Association (“SIA”)** indicated that the Reed Study fails to account for aggregate interference to earth stations from all terrestrial sources—that is, interference from both terrestrial mobile and P2MP service.
- The **CTIA** as well as the SIA agree that the Reed Study misuses aspects of the 3GPP 38.901 Rural Macro non-line-of-sight propagation model, which was designed for an entirely different purpose.

The CBA thus maintains that the FCC should reject proposals to deploy standalone P2MP in the C-band.

The CBA Reply Regarding Technical Parameter Adoption Enabling Safe Co-existence of 5G and C-Band Services in Adjacent Spectrum

AT&T’s proposal to allow “unrestricted licenses”—permitting terrestrial mobile operators to operate using full power without the obligation to ensure that earth stations do not receive harmful interference—is not feasible if earth stations are to continue to operate in the upper part of the C-band.

- The CBA contends that the use of 4G LTE deployment density as a proxy for 5G deployments results in an inaccurate assessment of the interference environment.
- The CBA provides technical analyses to show why a 20 MHz guard band is required between new terrestrial flexible-use operations and repacked satellite services.

As the CBA continues to collaborate with stakeholders in this proceeding, the CBA has outlined in its filing certain adjustments to its technical rules based upon AT&T’s analyses. The CBA’s changes will provide further flexibility to mobile operators while still avoiding interference and protecting FSS operations. These adjustments include:

- Greater flexibility in defining antenna elevation angles;
- Reduction of earth station protection zones;
- Minimizing the spectrum impairment impact of TT&C (Telemetry, Tracking, and Commanding)/Gateway sites;
- Improved FSS antenna filters, allowing 5G base stations to operate nearer to FSS earth stations and antennas; and
- Greater flexibility in measuring and enforcing aggregate out-of-band emission (OOBE) levels.

Conclusion

The CBA proposes a fully accountable, “whole package” solution that addresses every aspect of a very complex transition process, providing a high degree of certainty with respect to schedule and amount of spectrum cleared. The CBA’s proposal provides the fastest, most efficient path to reallocate a portion of the C-band and enable the rollout of 5G in the continental U.S.—with all the accompanying economic benefits—while protecting the incumbent content distribution services upon which nearly 120 million U.S. households rely.



U.S. Federal Communications Commission (FCC) proceeding. Follow our mission...visit www.c-bandalliance.com. Follow us on Twitter at @cbandalliance and on LinkedIn at C-Band Alliance.

The C-Band Alliance (CBA) was formed in October 2018 by the four leading global satellite operators – Intelsat (NYSE: I), SES (Euronext Paris: SESG), Eutelsat (Euronext Paris: ETL) and Telesat. The role of the CBA is to implement the safe and efficient clearing and repurposing of mid-band spectrum in the U.S., accelerating the deployment of 5G services and innovation, serving all Americans. The CBA is designed to act as a facilitator as described in the companies’ breakthrough, market-based proposal to clear a portion of C-band spectrum under a

