

C-Band Alliance Proposal Fact Sheet: Summary of Comments Filed at FCC

October 29, 2018

C-Band Alliance Filing Highlights

U.S. Federal Communications Commission Proceeding
GN Docket No. 18-122 and GN Docket No. 17-183

Our proposal to the Federal Communications Commission (the “FCC”) would establish a breakthrough, Market-Based Approach to allow satellite operators to clear frequencies to enable terrestrial mobile operators to access a portion of C-band spectrum. This would accelerate the deployment of next generation 5G services, while critically protecting the wide array of established satellite services and the customers that rely on them. We have provided many details that address the complex issues that arise from clearing up to 200 MHz of spectrum for terrestrial 5G wireless services.

We believe the FCC should adopt the Market-Based Approach for the following reasons:

- ***The Market-Based Approach represents the fastest way to repurpose C-band Downlink spectrum for terrestrial mobile services.*** The C-Band Alliance projects that repurposing up to 200 MHz can be completed within 18-36 months of a final Commission order.
- ***The Market-Based Approach will minimize the need for Commission intervention and complex and lengthy oversight.*** Extensive FCC oversight of a Transition Facilitator will prove unnecessary and likely delay deployment of 5G service in the C-band Downlink.
- ***The Market-Based Approach efficiently makes C-band Downlink spectrum available for terrestrial mobile use while protecting the quality, reliability, and certainty of existing C-band Downlink services on which millions of customers currently rely.***
- ***The Market-Based Approach is fully consistent with the law and the Commission’s statutory authority.*** The Market-Based Approach complies with Section 309(j) of the Communications Act, avoids anticompetitive outcomes, and satisfies the requirements of the MOBILE NOW Act and the ORBIT Act.

In addition to adopting the Market-Based Approach, the Commission should take the following steps to promote terrestrial 5G services while protecting incumbent uses of the band:

- ***The Commission should avoid prescriptive mandates.*** The Commission’s proposed definition of “protected earth stations,” for example, is unduly restrictive and unnecessary given the large number of small rural radio and television stations and private networks that rely on C-band programming but lack full-time technical personnel to monitor FCC rules and submit registration filings.

- ***The Commission should reject the Broadband Access Coalition’s Proposal (“BAC Proposal”) to add incompatible point-to-multipoint (“P2MP”) operations to the C-band Downlink.*** The BAC Proposal would disrupt critical incumbent satellite operations and effectively prevent satellite operators from clearing spectrum for terrestrial 5G services.
- ***The Commission should not impose burdensome and unnecessary information requirements on earth station operators.***
- ***The Commission should not permanently freeze applications for new C-band earth stations and space stations.*** A freeze would arbitrarily limit the ability of the FSS ecosystem to evolve in response to customer demands.
- ***The Commission should reject alternative transition mechanisms, including overlay auctions and variations on the incentive auction, which are slower, less efficient, and pose implementation challenges that the Market-Based Approach avoids.*** These alternatives require far more heavy-handed government intervention and would likely be tied up in litigation for years to come.

Who Will Benefit from the CBA Proposal?

- **The U.S. economy and American consumers** will benefit as 5G networks are more rapidly deployed, providing growth and the socio-economic benefits of a population that is connected to the most advanced mobile broadband infrastructure
- **Mobile service providers** will be able to obtain the right spectrum for the roll-out of 5G services, spectrum supporting both city and non-urban deployments.
- **Non-urban Americans** who are unlikely to have access to mmWave 5G, can be served by mid-band spectrum that travels longer distances.
- **Current users of C-band**, including media, data, government and private organizations, continue to thrive. Media customers will have confidence that the quality of their satellite-based distribution to **over 100 million U.S. households will be protected**, and that advertisers and viewers can continue to rely upon high-quality and reliable services.

Next Steps

Replies are due to the FCC on the comments filed on the Notice of Proposed Rulemaking by November 27, 2018.



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 U.S. Federal Communications Commission (FCC) proceeding. Follow our mission...visit www.C-BandAlliance.com