

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

December 7, 2018

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 (including a guard band) for terrestrial 5G wireless services.

The C-Band Alliance reply, filed December 7, 2018 addresses key issues raised in the opening round of comments. In addition, the Reply Comments expand upon earlier technical filings regarding protection of satellite services, 5G power levels and 5G out-of-band emissions. Highlights include:

- ***The Market-Based Approach will allow market forces to balance competing interests in the C-band downlink and produce a winning outcome for all interested parties. The increased access to mid-band spectrum provided by the CBA proposal will allow the U.S. to achieve 5G leadership, but not at the expense of existing, essential services in the band, creating a win/win.***
- ***The Market-Based Approach will safely clear up to 200 MHz of spectrum for wireless use (including a protective guard band) in just 18 to 36 months following receipt of a final Commission order.***
- ***The Market-Based Approach is the best mechanism to protect the quality, reliability, and certainty of existing C-band Downlink services. The CBA proposal is the only one to propose the launch of additional satellites and innovative technical solutions to create new capacity to offset that which will be lost as the lower 200 MHz are cleared.***
- ***The Market-Based Approach closes the digital divide by facilitating access to C-band Downlink spectrum, including in rural areas. The Market-Based Approach will carve-out some spectrum for a competitive process dedicated to small, regional, and rural carriers—including point-to-multipoint (“P2MP”) operators—to enter into Secondary Market Agreements (“SMAs”) to acquire mid-band spectrum.***
- ***The CBA’s October 22 proposal to increase the amount cleared to 200 MHz is the result of months of hard work and analysis with respect to contracted satellite usage requirements and technical interference mitigation tools. It is the only proposal to base clearing goals on the operators’ actual fleet capabilities and commercial commitments.***
- ***Clearing a portion of the C-band Downlink for terrestrial 5G is an arduous, complex, and costly task that the C-Band Alliance, acting as Transition Facilitator, is best positioned to undertake. The CBA proposal is the only one to provide a detailed framework of the process required to safely clear the spectrum.***

- **The Market-Based Approach is not an abdication of FCC control.** The FCC will exercise regulatory authority by: amending the Table of Frequency Allocations to authorize terrestrial mobile service in the C-band Downlink; reviewing license applications from entities entering into SMAs; and adopting a licensing framework and technical rules.
- **The benefits of the Market-Based Approach greatly outweigh any perceived concerns about a “windfall” to incumbents.** Any economic benefit to entities entering into SMAs is incidental to the goal of winning the race to 5G. (See the Eisenach Declaration filed under the proceeding on December 7, 2018 for all economic references.)
 - The prior significant investments in the C-band and the significant investment in resources necessary to implement a spectrum clearing exercise justify the participants to be adequately incentivized.
 - Economists filing in the proceeding indicate every year of delay costs the U.S. from 7-12 percent of the \$500B growth expected from 5G leadership for the U.S.
 - Past economic studies conclude that consumers and taxpayers are better off adopting a market-based approach over an administrative approach that returns all revenues to the Treasury if the market-oriented approach is just four months faster.
 - The CBA proposal is likely to accelerate access to spectrum by more than a few years, based on recent government-led spectrum proceedings.
- **The Market-Based Approach will not result in mutually exclusive applications and therefore will not trigger any obligation to employ an auction under Section 309(j).** CBA secondary market agreements qualify only one applicant for each license, fully compliant with the FCC’s obligation to avoid mutual exclusivity.
- **The CBA puts America First, accelerating spectrum access to enable U.S. 5G leadership. T-Mobile and Comcast seek to delay C-band 5G deployment for anticompetitive reasons.**
- **The Market-Based Approach adequately protects non-U.S. C-band satellite operators.** Although a small group of satellite operators admits they have no revenue and no customers in C-band in the U.S., the CBA commits to reimburse any CONUS earth station reconfiguration and/or relocation costs for these service providers, to the extent they have continental U.S. operations in the C-band downlink.
- **Under the Market-Based Approach, wireless Internet service providers (“WISPs”) and other P2MP service providers will have the opportunity to enter into SMAs to obtain C-band Downlink spectrum.** Commenters overwhelmingly oppose allocating P2MP operations in the C-band Downlink in frequencies that will remain for FSS use.
- **The CBA technical appendix sets forth updated analyses, based upon further review and analysis of key technical issues raised in the opening round of comments and discussions of those issues with customers, mobile network operators and 5G equipment providers.** As a result, the CBA is proposing additional protections to ensure that 5G operations will not materially degrade satellite services. These protections include limiting aggregate 5G in-band and out-of-band levels at satellite earth stations in order to avoid the potential for earth station LNB saturation and interference within the remaining C-band satellite spectrum.



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

