



January 22, 2019

VIA EMAIL

John Alden

spectrum-strategy-comments@ntia.doc.gov

National Telecommunications and Information Administration

U.S. Department of Commerce

1401 Constitution Ave, NW, Room 4600

Washington, D.C. 20230

Re: Developing a Sustainable Spectrum Strategy for America's Future

Dear Mr. Alden,

The Satellite Industry Association (“SIA”)¹ submits this letter in response to the above-referenced National Telecommunications and Information Administration (“NTIA”) request for comments to assist in developing a sustainable U.S. spectrum strategy.² SIA is a U.S.-based trade association providing representation of the leading satellite operators, service providers, manufacturers, launch services providers, remote sensing operators, and ground equipment suppliers. SIA is the unified voice of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business.

¹ SIA Executive Members include: AT&T Services, Inc.; The Boeing Company; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado Networks; Lockheed Martin Corporation; OneWeb; SES Americom, Inc.; Space Exploration Technologies Corp.; Spire Global Inc.; and Viasat, Inc. SIA Associate Members include: ABS US Corp.; Airbus Defense and Space, Inc.; Analytical Graphics, Inc.; Artel, LLC; Blue Origin; DataPath Inc.; Eutelsat America Corp.; ExoAnalytic Solutions; Globalstar, Inc.; Glowlink Communications Technology, Inc.; HawkEye 360; Hughes; Inmarsat, Inc.; Kymeta Corporation; Leonardo DRS; Panasonic Avionics Corporation; Peraton; Planet; SSL; Telesat Canada; Ultisat, Inc.; and XTAR, LLC. For more information, visit www.sia.org.

² See *Request for Comments on Developing a Sustainable Spectrum Strategy for America's Future*, Docket No. 181130999-8999-01 (rel. Dec. 20, 2018).



SIA supports NTIA’s efforts to develop a long-term sustainable U.S. spectrum strategy. As recognized by the President’s Space Policy Directives^{3,4} and the White House Spectrum Memorandum,⁵ the commercial satellite industry plays an important and growing role in the U.S. economy and national security. The commercial satellite industry provides both the domestic manufacture of equipment, including satellites and terrestrial ground infrastructure, and the provision of critical services, including broadband and launch of government and commercial space assets. To continue to support this crucial U.S. economic sector, it is vital that long-term access to sufficient spectrum for the expanding needs of the commercial satellite industry be made available.

Satellite operators have already invested billions of dollars in dozens of satellite networks that provide coverage of the United States and provide important services to consumers across the country, including the government, both directly or indirectly; the Satellite Industry contributed \$268.6B to the global economy in 2017, as shown in Appendix 1.⁶ Due to the long lead time to design, construct, and deploy satellite networks, satellite operators must obtain funding and spectrum rights years in advance of launch. Furthermore, geostationary satellite orbit networks, for instance, generally remain in operation for at least 15 years once on orbit and cannot be reconfigured to operate on different spectrum channels following launch. The Federal Communications Commission maintains space station and earth station approval lists, which detail frequencies utilized by these satellite systems.^{7,8} It is for these reasons, among others, that

³“Space Policy Directive—2, Streamlining Regulations on Commercial Use of Space”, Presidential Memoranda, 24 May 2018 <https://www.whitehouse.gov/presidential-actions/space-policy-directive-2-streamlining-regulations-commercial-use-space/>

⁴“Space Policy Directive—3, National Space Traffic Management Policy”, Presidential Memoranda, 18 June 2018, <https://www.whitehouse.gov/presidential-actions/space-policy-directive-3-national-space-traffic-management-policy/>

⁵“Presidential Memorandum on Developing a Sustainable Spectrum Strategy for America’s Future”, Presidential Memoranda, 25 October 2018 <https://www.whitehouse.gov/presidential-actions/space-policy-directive-3-national-space-traffic-management-policy/>

⁶ Satellite Industry Association, State of the Satellite Industry Report 2018, September 2018, https://www.sia.org/ssir_preview/

⁷“Space Station Approval List”, Federal Communications Commission, 3 December 2018, <https://www.fcc.gov/approved-space-station-list>

⁸“International Bureau, FCC Current Authorizations List By Name, Report WR08”, 22 January 2019, http://licensing.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr08b.hts?as_subsystem_code=SES&column=ADDRESS.address_nameC/Name&fstate=1/CURRENT&prepare=



long-term certainty for satellite spectrum access is a necessity that should be included in any U.S. spectrum strategy.

In addition, satellite networks are inherently regional and global in nature, making it critical that internationally harmonized spectrum be made available over the long term. As Administrator Redl has noted: “As it turns out, [radio frequency] doesn’t obey borders. So if you’re not working with your neighbors and with others around the globe, you’re going to find yourself in trouble pretty quickly.”⁹ Accordingly, the U.S. spectrum strategy must recognize the need for internationally harmonized spectrum.

SIA plans to provide more detailed feedback to NTIA on the commercial satellite industry’s long-term requirements and concerns regarding spectrum. SIA urges NTIA to consider additions to the record, such as this, as it moves forward with this proceeding. SIA is also available to provide any additional information NTIA may deem of assistance.

SIA appreciates the opportunity to contribute to NTIA’s long-term spectrum planning, and looks forward to further collaboration on this effort.

Respectfully submitted,

/s

SATELLITE INDUSTRY ASSOCIATION

Tom Stroup, President

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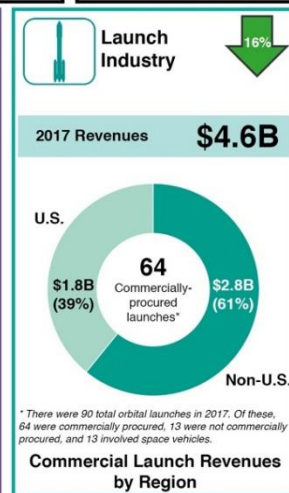
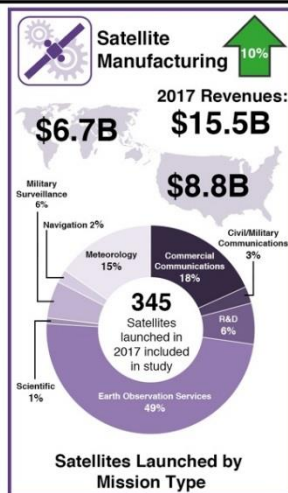
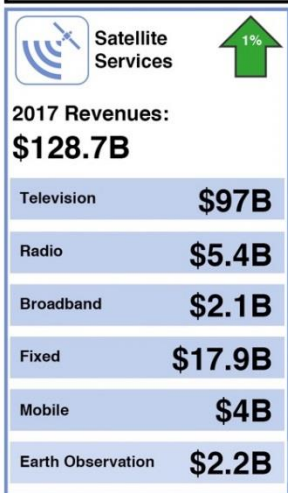
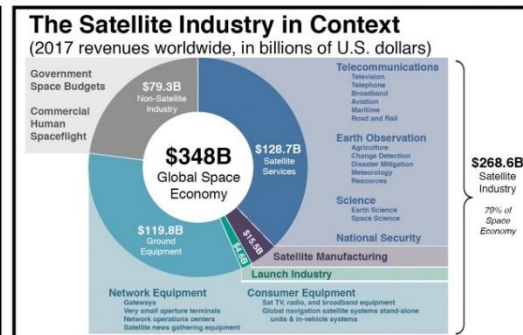
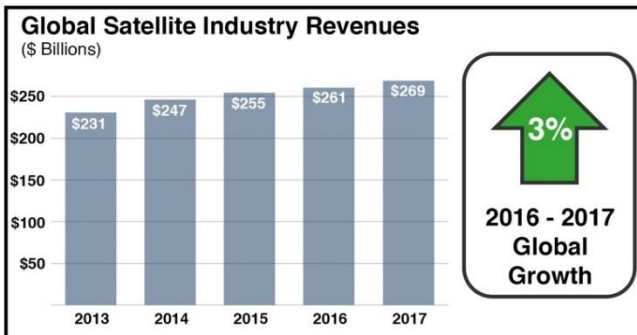
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⁹ Griffis, Kelcee. “US Must Push for Int’l Spectrum Use, Experts Say”, 14 September 2018, Law360 available at <https://www.law360.com/articles/1083067/us-must-push-for-flexible-int-l-spectrum-use-experts-say>



Appendix A: SIA State of the Satellite Industry Report, 2018

2018 State of the Satellite Industry



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