

To the Federal Communications Commission
Washington, DC, 20554
Via electronic filing
re: Docket number 18-122,
Use of C-band Frequencies for other terrestrial services

May 8, 2018

To the Commission:

I write in a 2-role capacity, the most important first. That of "broadcaster."

On behalf of WION radio, Ionia Michigan and WGLM AM/FM in Greenville, Michigan, I'd like to express concern over the sharing of what is now our C-band earth satellite receiving frequencies with other land-based services.

WION has always prided itself on it's locally-originated programming. We were into AM "revitalizing" before it was defined, having brought our station back from the dead in 2004.

Despite the fact that we take only one network feed each hour via satellite from the CBS radio network, the fact that this feed could be endangered is troubling. It is probably easy for the FCC to discount the role of satellite in the delivery of programming to local broadcasters, based on the availability of internet, which I suspect will happen frequently during this debate. In our location, there are only two options for internet. One barely constitutes "high speed" and the other is very costly, provided by Charter/Spectrum, who, if I want to get any higher speeds since being "grandfathered" in to the system wants to triple the bill from \$75/mo to around \$200/monthly.

Economics removed from this discussion, however, is the worry of the internet's reliability. From recent spring ice-storms to last week's wind storms, to our summer strong thunderstorms, the WION area has frequent power outages. While our radio station is fully backed-up by generator for almost any emergency, the cable lines are not, and the phone lines in this area tend to have issues when severe weather hits. As a broadcaster, how can I be thought of as a reliable source of news if I am forced to use internet delivery of news which may not be available in an emergency (should the use of my C-band receive dish is impeded) for the (hypothetical yet likely) betterment of texting between teens?

It is a mistake to "share" the frequencies as proposed, on the assumption that satellite is an outdated or less-necessary technology. It scares me to think how a well planned attack on our nation's internet communications infrastructure would bring down the very backbone of our communications ("the cloud") leaving citizens tuning their dials but finding no information because their radio stations' ability to deliver news was based solely upon internet delivery from the network(s) to them.

Equally deplorable that our emergency alert system infrastructure operates partially through the public internet.

My point here is a simple one: The downlink from satellite is a reliable, necessary, and expected link between any broadcaster's chosen source of news, and the listener or viewer. They may not know how we get our signals which bring news and information, but they EXPECT that nothing will interrupt the ability of the broadcaster to present that information to them. It is a mistake for the FCC or any organization to contemplate the possible interruption of this time-tested technology for the convenience of private communications companies and simple personal convenience. C-band works in the worst of weather, and is by far the most reliable means of broadcasters choosing their content for the consumer. While we do not rely on satellite for our station's format, many do. C-band interruption would, in effect, take many stations off the air if their music or information network delivery via C-band is interrupted.

Furthermore, addressing the cost of registration, it is outrageous for the FCC to be charging broadcasters (or consumers who wish) such a large fee to "register" their dish as protection. I can think of no commodity one can own outright in business or consumer circles, and then be charged to "protect" or "use" long after it's purchase, especially when caused by an oversight on the part of government.

Broadcasters, especially AM radio, but all broadcasters these days are under the gun more than ever, fighting to remain viable. We're expected to provide great service on less financial resources, we're told to operate in the public interest, but the tools from which we work keep shrinking in number. With AM, as this FCC knows, we battle noise, lack of quality standards for broadcasters and for consumers' receivers, and competition in general not to mention public perception. (I'm proud that WION radio has overcome the perception that AM is of lesser quality through excellent engineering and marketing but there are stations which have not.) I'm sure television is feeling the pinch of streaming video content. The music industry's greed is taking more and more of our budgets, time, and patience, and now looms this possibility of interference with one of the main tools a broadcaster has to choose and provide what we believe is the best programming for our audience: that being satellite delivery of content to our studios. Broadcasters did not cause this pending mess. Don't ask us to pay for protection from it, or share our resources. There's basically only two (satellite delivered/corporate-owned) pipelines for news and major content delivery anymore via satellite for us. Don't endanger those pipelines! In a (God Forbid) national emergency, you'll wish you hadn't, and so will many a broadcaster.

Now, on the personal side of this, I'm also an FTA enthusiast. (Free to Air.) This means I maintain my own satellite equipment for legal reception of non-encrypted content. Why do I do this? For budget, and for the challenge. While I am forced to subscribe to cable for internet, the choices for video offered are dismal to me. FTA allows me better quality pictures from the networks, better variety including some networks that are not carried over the air or by cable in my area, and...I'm proud of the fact I'm independent of subscriptions. PBS is used in my home, as are other networks and independent stations which have little chance of local carriage. My use of FTA may not contribute to anyone's wallet except for the purchase of the hardware I buy to receive and maintain my system, but I'm one of many thousands of FTA reception households in this country.

I'm also a member of satelliteguys.us which was started for satellite enthusiasts and now has grown to cover much more than just satellite TV, but is a leading website in it's field. Literally thousands of members use FTA for their home reception, and many would not have alternatives without their C-band dishes.

You may find it easy to discount C-band as dead, and as far as subscriptions go, yes...it is. It's not like the 1980's. However, the technology has changed to make satellite FTA affordable for more people now than subscription services and owning a C-band dish did back in the late 1980's. We no longer need nearly a thousand dollars for a receiver, around \$100-\$200 indoor hardware has made this "hobby" more attractive as home entertainment than ever. Endangering C-band not only can hurt broadcasters, but consumers as well: Maybe not in the millions, but in a significant amount of households that are "cutting the cord" and simply wanting stable reception of networks and other programming.

I ask the FCC not to endanger this reliable method of communications for professionals and entertainment for households across the country with hastily made decisions regarding sharing and/or reallocation of frequencies which have for decades served the public interest at many levels both directly to consumers and behind the scenes for broadcasters.

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