

Delivered Electronically

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: *Use of C-Band (3.7 – 4.2 GHz) spectrum for purposes other than satellite down link service.*
GN Docket Nos. 18-122, 17-183

Dear Ms. Dortch:

I write in a 2-role capacity, the most important first. That of "broadcaster" and second, that of "consumer." On behalf of the local stations in Tucson, Arizona and Society of Broadcast Engineers Chapter 32. I would like to express concern over the sharing of what is now our C-band earth satellite receiving frequencies with other land-based services. C-band has always provided as a necessary tool for national distribution of content to local providers who is entrusted with placing necessary content on air. The distribution of this content via C-Band is in the best interest of the public regarding use of these frequency's. Where as reallocating these frequencies for other land-based services is NOT in the best public interest.

The fact that C-Band feeds local television and FM / AM radio stations the content that they rely on 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. But given the lack of significant broadband competition in medium to lower sized markets makes this effort a losing battle. Whereas C-band penetrates every station nationally and has a lower distribution cost to programming providers.

I would like to point out the fact that some markets may only have one broadband provider who provides mediocre service and extremely limited fiber availability generally hampering the delivery of the bandwidth intense services that C-band provides to these rural areas. The lack of broadband competition in this country is another seriously concerning issue the FCC needs to address. In laymen's terms, broadband is not a reliable option when distributing content to every station in the country where as C-band has been proven with years of use and the frequencies are less susceptible to interruptions caused by weather and network outages.

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, programming, and the listener or viewer. The consumer may not know how broadcasters receive their signals which bring news, entertainment, 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.

As I mentioned earlier, C-Band works in the worst of weather, and is by far the most reliable means of distribution available to broadcasters choosing to get their content to their local affiliates. KU-Band

does not offer the same benefits to the broadcaster for nationally distributed programming and does not offer enough space for every broadcaster to move their links from C-Band to KU-Band.

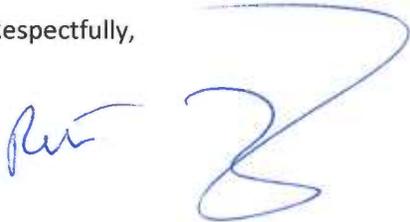
Furthermore, addressing the cost of registration, it is outrageous for the FCC to be charging broadcasters (or consumers who wish) such a large fee to "register" their dish as protection. The FCC often forgets there are still consumers who use C-BAND and it is an undue burden to require any - consumer to pay a fee or tax to register their C-Band dish so they could be protected from any interference.

In my personal opinion, the commission has left those users no options as the commission is looking to pull the plug from consumers who still use C-Band to receive content. I personally also enjoy the use of C-Band frequencies to get government services from NASA television on C-Band. Those services received include NASA-UHD in Ultra High Definition which is currently available to any consumer who wishes to receive it via a C-Band antenna.

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.

In closing, use of the C-band frequencies by broadcasters is far more valuable to consumers and is in the best public interest to leave the C-band frequencies allocated to broadcasters. We need to offer consumer protection to consumers who still use C-band as a method of receiving programming directly from distributors. I hope you can come to the same conclusion and leave the C-Band frequencies as they exist today with no use of C-band frequencies for any other purpose other than uplink and downlink operations.

Respectfully,

A handwritten signature in blue ink, appearing to read 'R. Nemitz', followed by a large, stylized flourish or scribble.

Robert Nemitz

Chairman
Society of Broadcast Engineers Chapter 32
Tucson, Arizona