



December 2, 2013

**FILED ELECTRONICALLY**

Diane Cornell  
Special Counsel to Chairman Wheeler  
Federal Communications Commission  
445 12th Street N.W.  
Washington, D.C. 20544

**Re: Satellite Industry Association Comments on FCC Reform**

Dear Ms. Cornell:

In response to your request for comments on the FCC reform process, the Satellite Industry Association (SIA)<sup>1</sup> would like to offer the following suggestions on how to improve FCC processes to ensure the timely and efficient delivery of advanced and innovative satellite services to consumers, businesses and government users.

For over four decades, the United States has been a leader in the commercialization of space. Today, over 90 in-orbit commercial satellites are licensed by or are authorized to serve the United States, providing U.S. consumers, businesses and government agencies with the benefits of one of the most developed satellite markets in the world.

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<sup>1</sup> SIA Executive Members include: Artel, LLC; The Boeing Company; The DIRECTV Group; EchoStar Satellite Services LLC; Harris CapRock Communications; Hughes Network Systems, LLC; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; LightSquared; Lockheed Martin Corporation.; Northrop Grumman Corporation; Rockwell Collins Government Systems; SES Americom, Inc.; and SSL. SIA Associate Members include: AIS Engineering, Inc.; Astrium Services Government, Inc.; ATK Inc.; Cisco; Cobham SATCOM Land Systems; Comtech EF Data Corp.; DigitalGlobe; DRS Technologies, Inc.; Encompass Government Solutions; Eutelsat, Inc.; Globecom Systems, Inc.; Inmarsat, Inc.; ITT Exelis; Marshall Communications Corporation.; MTN Government; NewSat America, Inc.; O3b Networks; Orbital Sciences Corporation; Panasonic Avionics Corporation; Row 44, Inc.; Spacecom, Ltd.; Spacenet Inc.; TeleCommunication Systems, Inc.; Telesat Canada; The SI Organization, Inc.; TrustComm, Inc.; Ultisat, Inc.; ViaSat, Inc., and XTAR, LLC.

In order for the U.S. to maintain its leading position in space, the Commission regularly reviews its Part 25 satellite and earth station licensing rules and processes to find efficiencies, consistent with its responsibility to protect the public interest. In this regard, SIA applauds the steps taken by the FCC to streamline the Part 25 rules over the years. The record in the most recent proceedings shows that more can be done, and the International Bureau has indicated that it will continue the streamlining process.

Pending the next phase in that process, SIA suggests that the FCC consider adopting some modest, informal guidelines to establish processing times for straightforward satellite and earth station applications. Providing greater certainty for applicants and reducing the time between application and grant will benefit the U.S. consumers, businesses and government agencies that rely on satellite services for their television, radio, and broadband data services.

Specifically, SIA recommends establishing the following timeframes as guidelines for the processing of straightforward satellite applications:

1. Applications for modifications to space station authorizations: The FCC should place such applications on public notice within 14 calendar days of receipt. If not contested, the FCC should act within 30 calendar days after the application comes off public notice.
2. Applications for a new space station authorization: The FCC should place such applications on public notice within 45 calendar days of receipt. If not contested, the FCC should act within 45 calendar days after the application comes off public notice.
3. Action on special temporary authorizations for space stations: The FCC should place all STA requests that require public notice on public notice within 10 calendar days of receipt. If not contested, the FCC should act within 14 calendar days after the request comes off public notice. For space station STA requests that do not require public notice, the FCC should act within 30 calendar days of receipt.

Comparable timelines should be established for earth station applications. We also recommend that the FCC look for opportunities to streamline inter-Bureau coordination in satellite bands shared with terrestrial services, as well as the inter-agency coordination in bands shared with Federal users.

SIA believes that these informal guidelines are reasonably achievable under the existing rules, and should become even easier to achieve as the Part 25 review process continues. Of course, the satellite industry recognizes that some applications will raise novel or unusual issues. While in some cases it may be appropriate to depart from the processing guidelines, the mere presence of a novel or unusual issue need not necessarily delay placing an application on public notice. The advantages of

developing a full administrative understanding of an application prior to public notice must be balanced with the timely introduction of innovative new satellite technologies and promotion of a more competitive marketplace.

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

/s/

A handwritten signature in black ink, appearing to read "Patricia Cooper". The signature is written in a cursive, flowing style.

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