National Public Radio, Inc. (“NPR”) hereby submits its reply comments in the above-captioned proceeding concerning licensing and operating rules for satellite services.\(^1\) NPR again applauds the Commission’s efforts to update and streamline regulatory requirements for satellite services through revision of Part 25.

NPR acknowledges that the record in this proceeding supports modest updates to the current ATIS rules and minimal involvement by the Commission. NPR reiterates its support for continued allowance of the insertion of ATIS information into the Network Information Table of an MPEG transport stream. NPR understands that the additional requirement of the inclusion of geographic location in the ATIS data is not overwhelmingly supported by the comments in this proceeding; however, NPR believes that such information would help all users identify and efficiently resolve interference. NPR notes that geographic location is a recommended element of the Carrier ID proposed by the Satellite Interference Reduction Group (SIRG).\(^2\)

---


NPR wishes to address an item raised in the comments filed by Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (EIBASS) regarding full-band, full-arc licensing of satellite earth stations. EIBASS proposes elimination of the obligation of terrestrial microwave services to afford full-spectrum, full-arc protection to satellite downlinks. EIBASS claims that this matter is within the purview of the above-captioned proceeding; however, the matter is not germane to this proceeding as it is beyond the scope of the Commission's Notice of Proposed Rulemaking.

The drastic change in licensing procedure proposed by EIBASS has already been raised and rejected. A previous proposal to eliminate licensing flexibility for earth station operators received strong opposition from a broad spectrum of interested parties and was dismissed by the Commission over ten years ago. The Commission rejected that proposal to eliminate protection because only “anecdotal evidence” was presented regarding any difficulties of spectrum sharing, which resulted in an “insufficient record.” EIBASS offers no new evidence or circumstances to demonstrate that this matter should be revisited now.

---


4 See id. at ¶ 2.


6 Id. at 2008 ¶ 13.

7 See EIBASS Comments; Fixed Wireless Communications Coalition Jan. 8, 2001 Comments, IB Docket No. 00-203.
As NPR stated in 2001, the existing rules enable space segment users to respond to changing circumstances, including unforeseeable satellite failures, with minimized disruption.\textsuperscript{8} NPR reaffirms its position in support of operational flexibility, which is essential to the utility of satellite communications.\textsuperscript{9}

**Conclusion**

NPR supports continued allowance of the insertion of ATIS information into the Network Information Table of an MPEG transport stream. Although the additional requirement of the inclusion of geographic location in the ATIS data is not overwhelmingly supported by the comments in this proceeding, such information would help all users identify and efficiently resolve interference. NPR supports operational flexibility and therefore encourages the Commission to dismiss the drastic change in licensing procedure proposed by EIBASS, since no new evidence has been presented to demonstrate that this matter should be revisited at this time.

\textsuperscript{8} NPR Jan. 8, 2001 Comments, IB Docket No. 00-203 at 4.

\textsuperscript{9} Other broadcasters, including the National Association of Broadcasters and the National Cable Television Association, have also previously rejected the elimination of full-band earth station licensing. See Satellite Industry Association Jan. 8, 2001 Reply Comments, WT Docket No. 10-153 at 5 n.17.
Respectfully submitted,

NATIONAL PUBLIC RADIO, INC.

Pete Loewenstein  
Vice President, Distribution  
Michael Starling  
Chief Technology Officer and Executive Director, NPR Labs  
Michael Riksen  
Vice President, Policy & Representation  
Rishi Hingoraney  
Director of Public Policy and Legislation  
/s/ Mariah Dodson  
Counsel

National Public Radio, Inc.  
635 Massachusetts Avenue, N.W.  
Washington, DC 20001  
(202) 513-2040

February 13, 2013