Comments of Microcom

Paragraphs 133-140. The Commission must implement in the Space Station application process some means of notifying satellite owners and operators of national objectives related to providing comparable services for broadband, television, and affordable space based services in all 50 states and US Territories. These objectives cannot be effectively met if those companies replacing existing satellites or starting construction of a new satellite do not acknowledge the need to provide comparable service to Alaska, Hawaii, and US Territories. Comparable service being that which is technically feasible and economically reasonable.

Microcom proposes keeping the requirement to notify the Commission when starting to construct a satellite. It is no more onerous than noting in a company’s SEC filings that they have contracted for a new satellite. We think that specific step is key to communicating national telecommunications policies and objectives and how satellite systems fit into them before engineering and development dollars are spent.

For example, NTIA is soliciting comments on the need for services in the arctic areas as commerce and resource development expand in those regions. It is certainly important for the satellite industry to be aware of that focus because decisions made in the design phase are cheap, recovering in the operational phase is expensive. In addition, the Universal Service Fund is spending large amounts of money to facilitate the national objective of universal access to broadband in rural areas. Some of the largest unserved areas that are the most expensive to serve are in Alaska and the US Territories. These national objectives are most effectively communicated to the organizations and companies that can potentially solve them in the application process.

Microcom suggests the Commission incorporate this statement into the FCC Form 312 to help implement this strategy:

Add Paragraph 43 to the Basic Qualifications:

“43. Service to Alaska, Hawaii, and US Territories. Where technically feasible and economically reasonable, is the applicant for a new or replacement satellite space station providing an EIRP and/or G/T that is equal to the center of beam values in the other states and is providing this signal over the land mass where elevation angles exceed 5 degrees. Yes/No. If the applicant is not doing this, they must explain why it is not technically feasible or economically unreasonable.”

Respectfully Submitted

Sandra Blinstrub
President
Microcom
129 W 53rd Ave
Anchorage, AK 99518
907-250-5608