



**Oral Testimony of Jennifer A. Manner**  
**Chairman, Satellite Industry Association**  
**Before the Federal Communications Commission**  
**En Banc Hearing on Public Safety Interoperable**  
**Communications and the 700 MHz D Block Proceedings**  
**Brooklyn, New York**  
**July 30, 2008**



Chairman Martin and Members of the Commission, thank you for inviting me to speak today on Public Safety Interoperable Communications, the 700 MHz D Block, and the role of satellite. My name is Jennifer Manner and I am here as the Chairman of the Satellite Industry Association. I am the Vice President of Regulatory Affairs for Mobile Satellite Ventures, one of SIA's members. SIA appreciates the chance to speak before the Commission, which understands the important role that satellite communications play in public safety communications. The Commission has been supportive of the valuable role satellite service can play in public safety, saying as recently as last year that it wants "to strongly encourage and facilitate the incorporation of satellite-based communications capability into public safety networks."

SIA believes that satellite services should be an essential and easily accessible component of any public safety



communications network. SIA urges the Commission to continue “to strongly encourage and facilitate the incorporation of satellite-based communications capability into public safety networks.” The satellite industry provides many innovative services, including broadband communications to public safety; including emergency responders and other American consumers at cost-effective rates, and does so using equipment that continues to decline in size and price, along with a decline in the cost of service.

While the satellite industry has not taken a position as to whether the Commission should maintain the public/private partnership condition as a requirement of the D Block license, we at SIA urge the Commission to: 1) maintain its requirement that the D Block licensee make available to public safety users at least one handset that includes a seamlessly integrated satellite solution; and 2) grant the D Block licensee flexibility in



meeting license obligations, such as build-out and “hardening” requirements, if the licensee integrates a satellite component, as an additional network layer, with the shared 700 MHz public/private communications infrastructure.

Satellites offer unique characteristics that meet the critical needs of public safety and emergency response providers.

Unlike any other communications technology, satellites are capable of providing truly ubiquitous coverage, from the most rural areas to the densest urban cores. Further, satellite operators are increasingly adding broadband data services to their standard service offerings. As a component of a public safety communications network, this capability would ensure that all geographic areas (including skies and waterways), no matter how remote, have available communications infrastructure at all times. Satellite services provide immediately available, additional communications capacity in



such areas to the benefit of public safety users, who would otherwise have to wait potentially years for the build-out of the public safety communications network and in many places can be done more cost-effectively than any terrestrial technology.

One of the big benefits of satellite networks is their relative immunity to the kinds of natural and man-made disasters that affect terrestrial infrastructure. A satellite service is highly reliable and many satellite operators also have in-orbit spares in the event of a satellite failure and deploy their ground stations in geographically diverse locations to avoid a single point of failure. Thus, satellites are typically not impacted by failures in the power grid or damage to underground cables or terrestrial microwave towers. When disaster strikes, satellite infrastructure that has been integrated into a public safety network can be relied upon to bridge the dangerous gaps in communications caused by damaged and destroyed terrestrial infrastructure by



providing an immediately available communications path, and assisting in restoral of the terrestrial network through backhaul of wireless systems.

To help make satellite communications more available, SIA has two recommendations. The first is that you maintain your existing requirement that the D Block licensee make available to public safety users at least one handset that includes a seamlessly integrated satellite solution. The record shows that this can be accomplished at very little additional cost. In contrast to the tiny additional costs, the benefits of having satellite capability for the public safety communications network are enormous.

Our second recommendation is that the that the Commission grant the D Block licensee flexibility in meeting license obligations, such as build-out and “hardening”



requirements, if the licensee integrates satellite service (offered outside the 700 MHz band) into the service that it provides in the shared 700 MHz public/private terrestrial network that it deploys. Such an option would make the D block conditions more flexible for potential licensees, while at the same time increasing the availability and robustness of the public safety communications network.

To conclude, SIA believes that the Commission should strongly encourage and facilitate the incorporation of satellite-based communications capability into public safety networks.

Mr. Chairman and Members of the Commission, thank you again for the opportunity to testify and for the privilege of being part of this important event.