

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Mangata Networks LLC)	
)	
Petition for a Declaratory Ruling)	File No. SAT-PDR-20200526-00054
Granting Access to the U.S. Market)	
For the Mangata Networks System)	

REPLY OF TELESAT CANADA

Mangata Networks LLC (“Mangata”) has submitted the above-referenced Petition for Declaratory Ruling (the “Petition”) by which it: (i) seeks access to the U.S. market for Mangata’s planned non-geostationary orbit (“NGSO”) satellite system, which will operate using Ka-band and V-band frequencies; and (ii) seeks waiver of several Commission rules, including band segmentation requirements that are set forth in Section 25.261(c).¹ Telesat was one of several parties to comment upon or petition to deny Mangata’s Petition.²

On September 24, 2020, Mangata submitted an opposition, styled as “Consolidated Reply Comments” (“Consolidated Reply”). Pursuant to Sections 1.45 and 25.154 of the Commission’s rules,³ Telesat hereby submits this Reply. Mangata

¹ 47 C.F.R. §25.261(c). See Petition, Legal Narrative at 16.

² See Comments of Telesat Canada, Call Sign S3068, IBFS File No. SAT-PDR-20200526-00054 (filed Sep. 8, 2020) (“Telesat Comments”); Petition to Deny or Condition of O3B Limited, Call Sign S3068, IBFS File No. SAT-PDR-20200526-00054 (filed Sep. 8, 2020); Comments of the Boeing Company, Call Sign S3068, IBFS File No. SAT-PDR-20200526-00054 (filed Sep. 8, 2020); Comments of Kuiper System LLC, Call Sign S3068, IBFS File No. SAT-PDR-20200526-00054 (filed Sep. 8, 2020); Petition to Deny In Part, Call Sign S3068, IBFS File No. SAT-PDR-20200526-00054 (filed Sep. 8, 2020).

³ 47 C.F.R. §§ 1.45, 25.154.

either has conceded or has not meaningfully responded to each of the points raised by Telesat.

Need for new V-band processing round. In its Comments, Telesat stated that since Commission has not initiated a new V-band processing round, interested parties should be given an opportunity to comment on Mangata's V-band proposals whenever such a processing round commences. Mangata concedes there is a need for a new V-band processing round to address the V-band portion of its Petition.⁴

Second round status of Mangata's Ku/Ka-band request. Telesat also stated in its Comments that since Mangata filed its Petition well after the deadline for the initial Ku/Ka-band processing round and did not seek a waiver of the deadline, the Petition should be considered in the second Ku/Ka-band processing round. Mangata appears to concede its second-round status.

Lack of support for Mangata's request for waiver of band splitting requirements vis-à-vis first round systems. To the extent Mangata seeks a waiver of the band segmentation requirements of Section 25.261(c) of the rules vis-à-vis first round systems, Telesat in its Comments opposed this request because second round systems are not entitled to split frequencies with first round systems during in-line interference events. Rather, as the Commission has held, second round systems must protect first round systems. Mangata did not even respond to this point, and any

⁴ See Consolidated Reply at 5.

Mangata request for a waiver vis-à-vis first round systems should be dismissed out of hand.

Lack of support for Mangata’s request for special treatment vis-à-vis second round systems. Mangata appears to have abandoned its request, which Telesat has opposed,⁵ for a waiver of the requirement in Section 25.261(c) of the rules that, absent coordination, would require Mangata to band split with other second round systems during in-line interference events. It seems Mangata now seeks authority instead for the following three-step process: (i) good faith coordination; (ii) what Mangata calls “new spectrum sharing technology” that it says would reduce interference below the levels required for band-splitting; and (iii) failing that, band splitting.⁶

It is unclear what Mangata means by “new spectrum sharing technology” that would reduce interference below the levels required for band-splitting. If this technology is just a means of achieving coordination without unduly impinging on other second-round systems, then what Mangata describes is actually the two-step process envisioned by Section 25.261, and no waiver should be necessary. If, on the

⁵ As Telesat stated in its Comments (at 3-4): (i) there is no basis for relieving Mangata of these band segmentation requirements while leaving other same round applicants under such an obligation, which would give Mangata an undeserved advantage vis-à-vis such other parties, including Telesat; and (ii) there is no basis for relieving all same round applicants of their band segmentation obligations, which would eviscerate the band segmentation rule.

⁶ *Id.* at 3.

other hand, Mangata is requesting that its technology be afforded special treatment, then Mangata has offered no showing to justify that special treatment and its request for waiver should be denied.

Respectfully submitted,

TELESAT CANADA

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply of Telesat Canada was sent via e-mail on September 30, 2020 to the following:

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