

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
Higher Ground LLC)	File No. SES-LIC-20150616-00357
Application for Blanket Earth Station License)	Call Sign E150095

COMMENTS IN SUPPORT OF APPLICATION

Pursuant to 47 C.F.R. § 25.154(a), Intelsat Corporation (“Intelsat”) submits these comments in support of Higher Ground LLC’s (“Higher Ground”) above-referenced application (“Application”) for a blanket earth station license to provide text messaging/light email and Internet of Things (“IoT”) communications throughout the United States.¹

Higher Ground’s Application proposes to introduce new, consumer-based low-cost messaging and other services using capacity on Intelsat’s Galaxy 3-C, Galaxy 12, and Galaxy 19 satellites. The Higher Ground earth station device, a SatPaq, is incorporated into a smartphone protective case and connected via Bluetooth to a messaging app on the smartphone. As Higher Ground’s distribution partner, Intelsat has reviewed and evaluated Higher Ground’s proposal and has concluded that the proposed services will offer substantial public benefits.

The public interest is best served when consumers have access to a diverse array of communications services and facilities, including robust satellite networks that can reach remote areas of the United States that are not well served by existing terrestrial networks. Higher

¹ See *Satellite Communications Services re: Satellite Radio Applications Accepted for Filing*, Public Notice, Report No. SES-01771, at 1-2 (Aug. 5, 2015) (announcing Higher Ground Application as acceptable for filing).

Ground's proposed service offerings will help satisfy consumer demand for affordable, ubiquitous messaging services offering universal connectivity across the United States.

Additionally, Higher Ground's proposed service will promote full and efficient use of C-band satellite spectrum and capacity. New and innovative services such as those proposed by Higher Ground will spur continued demand for satellite services, help ensure full and intensive use of existing, valuable C-band satellite resources, and encourage additional investments in existing and future satellite systems.

Furthermore, Intelsat has reviewed the Application's Technical Appendix, including the information regarding (i) SatPaq interference protection to other satellites and (ii) satellite downlink interference protection to terrestrial point-to-point systems.² Intelsat finds that the SatPaq use of spread spectrum techniques will ensure compliance with the FCC's off-axis power spectral density limits, thus protecting adjacent satellite systems. Moreover, the Intelsat satellites that will be used to provide the proposed SatPaq service operate in compliance with FCC and ITU power flux density limits, thus protecting terrestrial point-to-point systems from downlink interference.

² See Higher Ground, Application, Technical Appendix, at 4-8, 27-28 (June 16, 2015).

For the foregoing reasons, Intelsat fully supports prompt commercial deployment of Higher Ground's innovative, satellite-based messaging and IoT services to U.S. consumers, and urges an expeditious Commission grant of the Application.

Respectfully submitted,

INTELSAT CORPORATION

By: 


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CERTIFICATE OF SERVICE

I, Derrick Johnson, hereby certify that on August 27, 2015, a copy of the foregoing Comments is being sent by electronic mail to the following:

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