

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

In the Matter of	)	
	)	
International Bureau Releases Preliminary List of	)	IB Docket No. 20-205
Incumbent Earth Stations in the 3.7-4.2 GHz Band in	)	
the Contiguous United States	)	
	)	

COMMENTS OF GRAHAM MEDIA GROUP, INC.

Graham Media Group, Inc. (“Graham”) files these comments in response to the Commission’s July 6, 2020 Public Notice¹ releasing a preliminary list of Fixed Satellite Service (“FSS”) earth stations in the contiguous United States that the International Bureau (“Bureau”) has found may satisfy the criteria for classification as incumbent earth stations for the purposes of the 3.7-4.2 GHz band transition.² Specifically, Graham files these comments to request that the Bureau correct the GPS coordinates³ for earth station callsign E180777.

For KSAT, Graham’s broadcast station located in San Antonio, Texas, Graham requests that the Bureau correct its preliminary list of FSS earth stations to properly reflect the following location information:

Earth Station Callsign	File Number	Latitude	Longitude
E180777	SES-REG-20180608-01378	29° 26’ 12” N	98° 29’ 2” W

¹ *International Bureau Releases Preliminary List of Incumbent Earth Stations in the 3.7-4.2 GHz Band in the Contiguous United States*, Public Notice, DA 20-703, IB Docket No. 20-205 (rel. July 6, 2020) (“*Earth Station List*”).

² See *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343 (2020).

³ See *Earth Station List* at 3 (“Filings in this docket that provide minor corrections to site address and/or GPS coordinates of an existing earth station location or minor changes in operations . . . are permissible.”).

The current GPS information for earth station callsign E180777 in the Bureau's preliminary list of incumbent FSS earth stations inaccurately reflects coordinates 29° 26' 11" N, 98° 29' 0.2" W.⁴ Graham requests that the Bureau revise its preliminary list to accurately reflect the location coordinates listed above.

Please direct any questions to the undersigned.

Respectfully submitted,



Frank Daniels

Director of Technology, KSAT TV
Graham Media Group, San Antonio, Inc.
210-351-1251
fdaniels@ksat.com

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⁴ See *id.* Attachment 2.