



June 2, 2016

Sent via email [iotrhc2016@ntia.doc.gov](mailto:iotrhc2016@ntia.doc.gov)

National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W., Room 4725

Re: The Benefits, Challenges and Potential Roles for the Government in Fostering the Advancement of the Internet of Things, Docket 160331306-6306-1

**Dear Sir or Madam:**

The Satellite Industry Association (“SIA”)<sup>1</sup> hereby comments on the above-captioned Request for Public Comment regarding the “Benefits, Challenges, and Potential Roles for the Government in Fostering the Advancement of the Internet of Things”. The Internet of Things “IoT” promises to deliver new capabilities and markets, enhancing machine-to-machine (“M2M”) connectivity for the purpose of safety, security, and commerce. Ubiquitous and capable connectivity will be a driving factor for the success of IoT.

There is an opportunity in including both satellite and terrestrial complementary technologies as core infrastructure to the IoT. In particular, satellite technologies can be more quickly deployed than on-ground terrestrial services and are more resilient during natural disasters and other emergencies. Satellites can also enable IoT services in parts of the country that are unlikely ever to be served by terrestrial providers, which

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<sup>1</sup>SIA is a U.S.-based trade association providing representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. For more than two decades, SIA has advocated on behalf of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business. For more information, visit [www.sia.org](http://www.sia.org). SIA Executive Members include: The Boeing Company; The DIRECTV Group; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado Networks; Lockheed Martin Corporation; Northrop Grumman Corporation; OneWeb; SES Americom, Inc.; Space Exploration Technologies Corp.; SSL; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Artel, LLC; COMSAT Inc.; DigitalGlobe Inc.; DRS Technologies, Inc.; Eutelsat America Corp.; Global Eagle Entertainment; Glowlink Communications Technology, Inc.; Hughes; iDirect Government Technologies; Inmarsat, Inc.; Kymeta Corporation; O3b Limited; Panasonic Avionics Corporation; Planet Labs Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; and XTAR, LLC.

can be especially beneficial for public safety providers and mission critical services. Ubiquitous and continuous access to satellite communications will enable IoT remote infrastructure monitoring and control, transportation monitoring, personal location services, global software updates, and a more capable smart grid. Satellites also provide critical backhaul, which will provide resiliency in a future IoT economy, and as such will be part of any IoT.

NTIA has requested comment on examples of current policy that could foster IoT development and deployment, or technological issues that could hinder it. SIA strongly encourages NTIA to consider both the satellite and terrestrial spectrum needs required of these new services for both satellite and terrestrial services. Because satellites provide coverage for IoT services anytime, anywhere, the U.S. government should seek to harmonize spectrum allocations, including those for satellite.

Technology neutrality is also a key policy issue in developing a successful IoT ecosystem. Any regulations or programs, including any subsidies that NTIA adopts to support the deployment of IoT, should be technology neutral. This will allow technologies to change over time, and ensure the U.S. does not fall behind by favoring one manifestation of IoT services.

The satellite industry stands ready to connect IoT services to the public, industry, and government with 24-hour connectivity, in both urban and remote areas. Harmonized spectrum allocations and a policy of technology neutrality will help foster the advancement of the Internet of Things and bring its benefits to fruition.

Respectfully submitted,

/s/

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