

From: Mariah Shuman

To: Nimesh Sangani  
Date: March 14, 2019

Subject: Request for Info - File # 0970-EX-CN-2018

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Message:

OneWeb hereby responds to the questions circulated by OET on February 22, 2019 (Reference Number 46292):

1. Describe the need for 75 earth stations. Could the test and evaluation task be performed with 5 or 10 earth stations?

OneWeb Response: As described in the narrative attachment, OneWeb is a U.S. market access grantee for a global 720-satellite, U.K.-authorized, non-geostationary fixed-satellite system (the "OneWeb System"). On February 27, OneWeb launched its first six satellites. OneWeb seeks experimental authority for 75 earth stations (specifically, Ku-band user terminals) because it is necessary to test multiple user terminal devices at each gateway location as well as other geographically-dispersed locations in the United States in order to obtain critical data regarding the operational performance of these user terminals and more broadly, the OneWeb System. Seeking authority for only 5-10 earth station terminals would not allow OneWeb to fully evaluate the operational characteristics of the OneWeb System as OneWeb prepares to provide full commercial service across the entire United States, including all of Alaska, Hawaii, and the territories.

2. Will you be providing commercial service under this license?

OneWeb Response: No. OneWeb will not be providing commercial service pursuant to the requested experimental license.

3. The nationwide 75 earth stations is a broad request. Describe in detail your plan to avoid interference with the existing licensee in the area?

OneWeb Response: OneWeb is currently preparing to operate a global NGSO FSS network, covering all of the United States. As a responsible satellite operator, OneWeb is very familiar with and respectful of the Ku-band operating environment, wherein NGSO FSS operations are allocated on a primary basis for commercial service (including primary status for blanket-licensed user terminals across most of OneWeb's authorized Ku-band frequencies).

As noted above, OneWeb plans to eventually provide global commercial service using Ku-band user terminals, which will include the deployment of many ubiquitous terminals. Thus, it is in OneWeb's best interests to operate these experimental user terminals in a manner such that the potential for interference to any incumbent, licensed operations is minimized. Although OneWeb does not expect that its experimental operations will result in harmful interference to licensed users of these frequencies, it will of course take prompt action to correct any reported incidents of such interference.

All experimental operations will be conducted on a non-interference basis and will be consistent with OneWeb's existing and future coordination agreements with other satellite operators.