



SatCom Law LLC  
1317 F St. NW, Suite 400  
Washington, D.C. 20004  
T 202.599.0975  
www.satcomlaw.com

November 20, 2017

***By Electronic Filing***

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: O3b Limited Applications for U.S. Market Access  
File Nos. SAT-AMD-20170301-00026 & SAT-AMD-20171109-00154 (Call Sign S2935)**

Dear Ms. Dortch:

O3b Limited (“O3b”), by its attorney and pursuant to Section 1.65 of the Commission’s rules, hereby updates the record regarding the above-referenced applications seeking additional authority to serve the U.S. market using a system of satellites in medium earth orbit.<sup>1</sup> Specifically, O3b makes the following corrections or clarifications to the pending applications.

- **Number of V-band Satellites Proposed:** Footnote 11 of the November 2017 Amendment states that “O3b is not proposing any changes to the number of its proposed satellites that will carry V-band frequencies at this time.” However, as O3b previously made clear in the March Amendment, only equatorial satellites that have the full range of requested Ka-band frequencies, designated as “O3bN” satellites, will also be equipped with V-band frequencies.<sup>2</sup> O3b originally requested U.S. market access for up to 24 O3bN satellites,<sup>3</sup> but the reductions described in the November 2017 Amendment reduce that number to 12. Specifically, the November 2017 Amendment seeks authority for 22 full-frequency Ka-band satellites, but only 12 of those will be in equatorial orbit, and the remaining 10 will operate in inclined orbital planes.<sup>4</sup> Thus, to clarify, O3b is seeking U.S. market access for 12 V-band satellites.

---

<sup>1</sup> See Amendment Application of O3b Limited, Call Sign S2935, IBFS File No. SAT-AMD-20170301-00026 (“March Amendment”); Amendment Application of O3b Limited, Call Sign S2935, IBFS File No. SAT-AMD-20171109-00154 (“November 2017 Amendment”).

<sup>2</sup> March Amendment, Legal Narrative at 2, Technical Annex at 1-2.

<sup>3</sup> See *id.*

<sup>4</sup> November 2017 Amendment, Legal Narrative at 4.

- Correction of Schedule S: The Schedule S submitted with the November 2017 Amendment incorrectly indicated that receiving beam VRL2 is a shapeable beam. The correct beam type for VRL2 is steerable.
- Independence of V-band and Ka-band Payloads: The V-band payload described in the March Amendment is separate from the Ka-band payloads described in prior O3b applications. In addition, the Technical Annex to the March Amendment contained an error in the description of the V-band payload. Specifically, the penultimate sentence of the introductory paragraph of Section A.3.2 erroneously mentioned beam forming as one of the measures used to achieve frequency re-use. That sentence should be corrected to read as follows:

Frequency re-use (per satellite) is achieved by a combination of dual-polarization (RHCP and LHCP), ~~beam forming~~, and spatial isolation between co-frequency, co-polarized antennas.

Please address any questions regarding this matter to the undersigned.

Respectfully submitted,

*/s/ Karis A. Hastings*

Karis A. Hastings

Counsel for O3b Limited  
karis@satcomlaw.com

cc: Alyssa Roberts  
Kal Krautkramer