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May 31, 2018

VIA ELECTRONIC FILING

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

Re: O3b Limited, File Nos. SAT-MOD-20160624-00060, SAT-AMD-20161115-00116, SAT-AMD-20170301-00026 & SAT-AMD-20171109-00154

Dear Ms. Dortch:

On May 29, 2018, Suzanne Malloy, Will Lewis, and Noah Cherry¹ representing O3b Limited (“O3b”) spoke by telephone with Stephen Duall and Kerry Murray of the FCC’s Satellite Division and separately with Umair Javed, Legal Adviser to Commissioner Rosenworcel and Erin McGrath, Legal Adviser to Commissioner O’Rielly regarding the Commission’s draft decision relating to the above-referenced applications.² O3b also spoke by phone separately with Will Adams, Legal Adviser to Commissioner Carr on May 30, 2018 and Rachael Bender, Legal Adviser to Chairman Pai on May 31, 2018.

O3b noted that approval of the Draft Order would permit market access for additional O3b satellites scheduled to be launched next year to expand the existing constellation, as well authorize a new constellation of next-generation MEO satellites that will allow for further growth of O3b’s services available in the U.S. market.

O3b requested clarification on several minor points in the text of the Draft Order as detailed below. Specifically, O3b requested that the Commission:

1. Clarify in Paragraph 46.c. of the Draft Order that O3b may use without prior coordination any portions or polarizations of the 19.3-19.7 GHz and 29.1-29.5 GHz bands that are not in use by previously authorized NGSO MSS systems. For example, no NGSO MSS system is currently authorized to use the 19.3-19.4 GHz, 19.6-19.7 GHz, and 29.3-29.5 GHz portions of the band. The Commission should not restrict O3b’s access to

¹ Noah Cherry did not participate in the telephone call with Stephen Duall.

² Modification of U.S. Market Access for O3b Limited, Order and Declaratory Ruling, IBFS File Nos. SAT-MOD-20160624-00060, SAT-AMD-20161115-00116, SAT-AMD-20170301-00026 & SAT-AMD-20171109-00154, FCC-CIRC1806-05 (rel. May 17, 2018) (“Draft Order”).

these portions of the band pending unrelated coordination discussions involving other band segments.³

2. Permit O3b to operate in portions of the 19.3-19.7 GHz and 29.1-29.5 GHz bands on a non-interference basis where there are previous authorized NGSO MSS systems, pending the completion of coordination with such systems. Permitting O3b to operate on a non-interference basis would create the appropriate incentives among the coordinating parties.
3. Provide O3b with certainty regarding the orbital parameters of O3b's already launched and operational satellite constellation, while recognizing operators' mutual obligations to coordinate physical operations of spacecraft as set forth in Paragraph 50.
4. Replace the term "harmful interference" in Paragraph 47.k. with "unacceptable interference," consistent with the text of Section 25.289 of the Commission's rules.⁴

Sincerely,



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³ O3b proposes the following changes to Paragraph 46.c. of the Draft Order: "~~Operations in the 19.3-19.7 GHz and 29.1-29.5~~19.4-19.6 GHz and 29.1-29.3 GHz frequency bands shall not cause interference to and must accept interference from operations of ~~must be coordinated with~~ any previously authorized NGSO MSS systems not included in this Ku-Ka-band processing round. ~~U~~ until any required coordination agreement is obtained; ~~transmissions to or from any earth station located in U.S. territory shall not be conducted in these frequency bands.~~ Sharing of the 19.3-19.7 GHz and 29.1-29.5 GHz frequency bands with other authorized operators will be subject to Section 25.261."

⁴ 47 C.F.R. § 25.289.