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March 27, 2018

VIA ELECTRONIC FILING

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

Re: Oral Ex Parte Notice
IBFS File Nos. SAT-AMD-20172106-00167, SAT-AMD-20172106-00168
Call Signs S2966 & S2977

Dear Ms. Dortch:

On March 23, 2018, representatives of The Boeing Company (“Boeing”) met with staff of the FCC’s International Bureau to discuss Boeing’s pending amendments to substitute SOM1101 as the applicant for the above-referenced satellite system applications. Participating in the meeting on behalf of the Commission were Jose Albuquerque, Chief, Satellite Division; Karl Kensinger, Deputy Division Chief; Kerry Murray, Deputy Division Chief; Jennifer Gilson, Assistant Bureau Chief; Stephen Duall, Chief, Satellite Policy Branch; and Merissa Velez, Policy Branch Attorney. Participating in the meeting on behalf of Boeing were Audrey Allison, Vice President, Global Spectrum Management; Al Lambert, Chief Counsel, BDS Space and Missile Systems; Andrew McBride, Partner, Perkins Coie; and the undersigned.

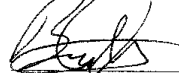
During the meeting, the Boeing representatives discussed the significant efforts that Boeing has made in developing its non-geostationary satellite orbit (“NGSO”) satellite systems, including identifying new methods for spectrum sharing between satellite and terrestrial systems in millimeter wave frequencies. Boeing also highlighted its continuing work before the Commission and the International Telecommunication Union to ensure that critical spectrum resources remain available for NGSO satellite systems operating in both the Ka- and the V-band in order to address the global digital divide. It was explained, however, that Boeing was confronted with a change in business circumstances and Boeing now seeks to substitute SOM1101 as the applicant for two of its NGSO system applications in order to maximize the potential of their continued development and launch. Although SOM1101 and Boeing have no understanding or agreement regarding Boeing’s potential future involvement in the NGSO satellite systems, Boeing desires to continue its involvement in the manufacture of these satellite systems and would remain available in such capacity to support SOM1101 in this effort if an agreement was reached in the future.

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The meeting participants also discussed the background and interpretation of Sections 1.2110, 25.159, and 25.116 of the Commission's rules. The substance of this discussion is reflected in Boeing's Opposition, dated February 27, 2018, and its *ex parte* letter, dated March 21, 2018. Boeing also addressed the significant public interest benefits that would result from the involvement of Greg Wyler in the two NGSO satellite system applications and the good cause that exists for a waiver of the Commission's rules if deemed necessary.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,



Bruce A. Olcott
Counsel to The Boeing Company

CERTIFICATE OF SERVICE

I, Bruce A. Olcott, hereby certify that on March 27, 2018, I caused a copy of the foregoing Oral Ex Parte Notice of The Boeing Company to be served by U.S. first-class mail, postage paid, upon each of the following:

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