

# JONES DAY

51 LOUISIANA AVENUE, N.W. • WASHINGTON, D.C. 20001.2113  
TELEPHONE: +1.202.879.3939 • FACSIMILE: +1.202.626.1700

DIRECT NUMBER: (202) 879-3630  
BOLCOTT@JONESDAY.COM

April 20, 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 April 18, 2018, representatives of The Boeing Company (“Boeing”) met in separate meetings with the legal advisors for many of the FCC Commissioners to discuss Boeing’s pending amendments to substitute SOM1101 as the applicant for the above-referenced satellite system applications. Participating in the meetings on behalf of the Commission were Rachael Bender, legal advisor to Chairman Pai; Erin McGrath, legal advisor to Commissioner O’Rielly; Will Adams, legal advisor to Commissioner Carr; and Umair Javed, legal advisor to Commissioner Ronsenworcel. Participating in the meetings on behalf of Boeing were Al Lambert, Chief Counsel, BDS Space and Missile Systems, Andrew McBride of Perkins Coie, and the undersigned.

Boeing’s significant efforts in developing its non-geostationary satellite orbit (“NGSO”) satellite systems were discussed during the meetings, 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.

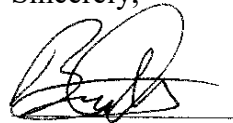
It was explained that Boeing was confronted with a change in business circumstances and Boeing now seeks to substitute SOM1101 as the applicant for two of its NGSO system applications. Given the track record of Greg Wyler in developing NGSO satellite systems, the substitution of SOM1101 as the applicant will provide the best opportunity to ensure the construction and launch of the proposed satellite systems and their use to provide very high data

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rate services to underserved end users throughout the world. The participants in the meetings also briefly discussed the interpretation and intent of Sections 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.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Olcott", written over a horizontal line.

Bruce A. Olcott  
Counsel to The Boeing Company

## CERTIFICATE OF SERVICE

I, Bruce A. Olcott, hereby certify that on April 20, 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:

Karis Hastings  
SatCom Law LLC  
1317 F Street, NW Suite 400  
Washington, DC 20004

Suzanne Malloy  
Vice President, Regulatory Affairs  
900 17th Street, NW, Suite 300  
Washington, DC 20006

William M. Wiltshire  
HARRIS, WILTSHIRE & GRANNIS LLP  
1919 M Street, N.W. Suite 800  
Washington, D.C. 20036

Tim Hughes  
Senior Vice President  
SPACE EXPLORATION TECHNOLOGIES CORP.  
1030 15<sup>th</sup> Street, N.W., Suite 220E  
Washington, D.C. 20005

Scott Blake Harris  
HARRIS, WILTSHIRE & GRANNIS LLP  
1919 M Street, NW, Suite 800  
Washington, DC 20036

Henry Goldberg  
Goldberg, Godles, Wiener & Wright LLP  
1025 Connecticut Avenue, Suite 1000  
Washington, DC 20036

Leslie Milton  
Senior Counsel, Regulatory Affairs  
1601 Telesat Court  
Ottawa, Ontario, Canada, K1B 5P4



Counsel to The Boeing Company