

# 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 18, 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 16, 2018, representatives of The Boeing Company (“Boeing”) met with Louis Peraertz, Senior Legal Advisor to Commissioner Clyburn 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 Boeing were Al Lambert, Chief Counsel, BDS Space and Missile Systems, and the undersigned.

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

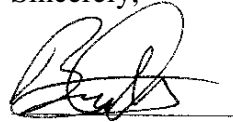
It was explained that Boeing was confronted with a change in business circumstances and Boeing now seeks to substitute SOM1101 as the applicant for two of its NGSO system applications. Given the track record of Greg Wyler in developing NGSO satellite systems, the substitution of SOM1101 as the applicant will provide the best opportunity to ensure the construction and launch of the proposed satellite systems and their use to provide very high data rate services to underserved end users throughout the world. The meeting participants also briefly discussed the interpretation and intent of Sections 25.159 and 25.116 of the Commission’s rules.

Marlene H. Dortch  
April 18, 2018

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