

January 26, 2018

*VIA ELECTRONIC FILING*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: **O3b Limited Notice of Ex Parte Presentations:  
The Boeing Company, File Nos. SAT-AMD-20171206-00167 (Call Sign S2966)  
and SAT-AMD-20171206-00168 (Call Sign S2977);  
WorldVu Satellites Limited, SAT-AMD-20180104-00004 (Call Sign S2994);  
Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service  
Systems and Related Matters, IB Docket No. 16-408**

Dear Ms. Dortch:

On January 24 and 25, 2018, representatives from O3b Limited met separately with legal advisors to Chairman Pai and Commissioners O’Rielly, Carr, Clyburn, and Rosenworcel, as well as representatives from the International Bureau<sup>1</sup> to discuss the above-referenced proceedings.

O3b expressed concern that recent proposed amendments to existing non-geostationary (“NGSO”) processing round applications,<sup>2</sup> and Petitions for Reconsideration of the Commission’s NGSO Report and Order,<sup>3</sup> would introduce significant uncertainty in the current Ku-/Ka-band and V-band processing rounds, and referenced the significant resources expended to date on NGSO systems of applicants who submitted applications by the NGSO

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<sup>1</sup> See Annex 1 for participants and dates for each meeting.

<sup>2</sup> Amendment of the Boeing Company, Call Sign S2966, File No. SAT-AMD-20171206-00167; Amendment of the Boeing Company, Call Sign S2977, File No. SAT-AMD-20171206-00168; Amendment of WorldVu Satellites Limited d/b/a OneWeb, Call Sign S2994, File No. SAT-AMD-20180104-00004.

<sup>3</sup> *Update to Parts 2 and 25 Non-Geostationary, Fixed-Satellite Concerning Service Systems and Related Matters*, Petition for Reconsideration of ViaSat Inc., IB Docket No. 16-408 (filed Jan. 17, 2017); Petition for Reconsideration of WorldVu Satellites Limited, IB Docket No. 16-408 (filed Jan. 17, 2018).

processing round cut-off date. O3b noted that there is ample Commission precedent relevant to these recent applications, including policies to prevent speculation and warehousing by limiting the number of unbuilt NGSO licensed systems and pending NGSO applications, and provisions that specify the changes that can be made to a processing round application without disqualifying the application as amended from consideration as part of the processing round.

O3b expects to comment on, as appropriate, each of the proposed amendments and petitions for reconsideration.

A copy of this letter has been submitted to the relevant proceedings pursuant to 47 C.F.R. §§ 1.1200 *et seq.* Please direct any questions regarding this notification to the undersigned.

Respectfully submitted,

/s/ Suzanne Malloy

Suzanne Malloy

Vice President, Regulatory Affairs

O3b Limited

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cc: All Commission staff members identified on Annex 1 (via email)  
Bruce Olcott, Counsel to The Boeing Company (via mail and email)  
Brian D. Weimer, Counsel to OneWeb (via mail and email)  
William Wiltshire, Counsel to SpaceX (via mail and email)  
Ryan Gardner (via mail)

**Annex 1**

Meeting Date	O3b Representatives	FCC Participants
Jan. 24, 2018	Suzanne Malloy, Noah Cherry, and Karis Hastings	Louis Peraertz, Senior Legal Advisor to Commissioner Clyburn
Jan. 25, 2018	Suzanne Malloy, Noah Cherry, Karis Hastings, Will Lewis*, and Zachary Rosenbaum*	International Bureau <ul style="list-style-type: none"> <li>• Tom Sullivan, Bureau Chief</li> <li>• Troy Tanner, Deputy Bureau Chief</li> <li>• Jennifer Gilsenan, Assistant Bureau Chief</li> </ul> International Bureau, Satellite Division <ul style="list-style-type: none"> <li>• Jose Albuquerque, Division Chief</li> <li>• Karl Kensinger, Deputy Division Chief</li> </ul>
Jan. 25, 2018	Suzanne Malloy, Noah Cherry, and Karis Hastings	Umair Javed, Legal Advisor to Commissioner Rosenworcel
Jan. 25, 2018	Suzanne Malloy, Noah Cherry, and Karis Hastings	Erin McGrath, Legal Advisor to Commissioner O’Rielly
Jan. 25, 2018	Suzanne Malloy, Noah Cherry, and Karis Hastings	Rachael Bender, Wireless and International Advisor to Chairman Pai
Jan. 25, 2018	Suzanne Malloy, Noah Cherry, and Karis Hastings	Will Adams, Legal Advisor to Commissioner Carr

\*Participated via phone