

OneWeb 1400 Key Blvd. Suite 1, Floor A Arlington, VA 22209

February 8, 2018

VIA ELECTRONIC DELIVERY

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

Re: Notice of Ex Parte Presentation in IB Docket No. 16-408 and IBFS File No. SAT-AMD-20180104-00004

Dear Ms. Dortch:

On February 6, 2018, Mariah Shuman (Senior Director of Regulatory Affairs), Marc Dupuis (Senior Director of Spectrum Affairs), Shawn Marcum (Regulatory Associate) for WorldVu Satellites Limited ("OneWeb") and Brian Weimer (Counsel for OneWeb) met with Thomas Sullivan (Chief of the Commission's International Bureau), Troy Tanner (Deputy Chief of the International Bureau), Jennifer Gilsenan (Assistant Bureau Chief, International Bureau), Jose Albuquerque (Chief of the Satellite Division of the International Bureau), and Kathyrn Medley (Chief of the Engineering Branch of the Satellite Division), to discuss OneWeb's positions of record in the above-referenced proceeding¹ and OneWeb's pending Amendment of its Petition to access the U.S. market via its medium-earth orbit ("MEO") constellation.²

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¹ See Comments of OneWeb, IB Docket No. 16-408 (filed Feb. 27, 2017); Reply Comments of OneWeb, IB Docket No. 16-408 (filed Apr. 10, 2017); Petition for Reconsideration of WorldVu Satellites Limited, IB Docket No. 16-408 (filed Jan. 17, 2018) ("NGSO Petition for Reconsideration"); Comments of WorldVu Satellites Limited, Hughes Network Systems, LLC, and Intelsat Corporation, IB Docket No. 16-408 (filed Jan. 2, 2018) ("Satellite Operator Comments"); Reply Comments of WorldVu Satellites Limited, Hughes Network Systems, LLC, and Intelsat Corporation, IB Docket No. 16-408 (filed Jan. 29, 2018) ("Satellite Operator Reply Comments").

² In re WorldVu Satellites Limited Amendment to Petition for Declaratory Ruling Granting Access to the U.S. Market for the OneWeb V-Band System, File No. SAT-AMD-20180104-00004 (filed Jan. 4, 2018) (the "MEO Amendment").

OneWeb reiterated its positions of record, as follows:

- The domestic coverage requirement for NGSO FSS systems in the United States should be retained.³
- The global public notice of an NGSO FSS system should be utilized to guide spectrum sharing in the United States, as opposed to band segmentation, when coordination in good faith is not achievable.⁴
- The Commission's recent drastic change to NGSO system deployment milestones is the key factor that led to OneWeb's requested MEO Amendment.⁵

Very truly yours,

/s/ Mariah D. Shuman

Mariah D. Shuman Senior Director of Regulatory Affairs

cc: Thomas Sullivan
Jose Albuquerque
Troy Tanner
Jennifer Gilsenan
Kathyrn Medley

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³ See generally Satellite Operator Comments; Satellite Operator Reply Comments.

⁴ See generally NGSO Petition for Reconsideration.

⁵ See MEO Amendment at 4.