

March 14, 2018

EX PARTE PRESENTATION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Presentation in SAT-AMD-20180104-00004, *WorldVu Satellites Limited, Amendment to Petition for Declaratory Ruling Granting Access to the U.S. Market for the OneWeb V-Band System*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, the MVDDS 5G Coalition¹ (the "Coalition") submits this letter summarizing a meeting with the following Commission staff from the International Bureau and Wireless Telecommunications Bureau: Jose Albuquerque, Peter Daronco, Stephen Duall (by phone), Jennifer Gilsean, Nese Guendelsberger, Karl Kensinger, Matthew Pearl, Blaise Scinto, Tom Sullivan, and Troy Tanner. The Coalition was represented in the meeting by Stephen Díaz Gavin (counsel for Vision Broadband, by phone), Alison Minea and John Kim (for DISH Network), Kirk Kirkpatrick (MDS Operations, by phone), Tim Myer (GoLong Wireless), and Aaron Shainis (counsel for GoLong Wireless).

During the meeting, the Coalition explained its preliminary view regarding the procedural status of WorldVu Satellites Limited's ("OneWeb") pending amendment to its application ("Amendment") seeking U.S. market access for a non-geostationary satellite orbit ("NGSO"), fixed-satellite service ("FSS").² In particular, the Coalition explained that the Amendment makes modifications to the proposed configuration of OneWeb's medium-earth orbit ("MEO") constellation. OneWeb originally requested authority to deploy 1,280 satellites across 10 gigahertz of spectrum in the V-Band. OneWeb now seeks approval for 2,560 satellites across 28.75 gigahertz of spectrum.³ The new frequencies include the 12.2-12.7 GHz band, which falls

¹ The Coalition includes a cross-section of multichannel video distribution and data service ("MVDDS") and direct broadcast satellite ("DBS") licensees holding authorizations in the 12.2-12.7 GHz band, including: Braunston Spectrum LLC, Cass Cable TV, Inc., DISH Network L.L.C., GO LONG WIRELESS, LTD., MDS Operations, Inc., MVD Number 53 Partners, Satellite Receivers, Ltd., SOUTH.COM LLC, Story Communications, LLC, Vision Broadband, LLC, and WCS Communications, Inc.

² WorldVu Satellites Limited, Amendment to Petition for Declaratory Ruling Granting Access to the U.S. Market for the OneWeb V-Band System, SAT-AMD-20180104-00004 (filed Jan. 4, 2018) ("Amendment").

³ Amendment at 1-2.

outside of the V-Band processing round. Members of the Coalition hold numerous licenses to use the 12.2-12.7 GHz band for MVDDS and DBS services.

Under the Commission's Part 25 rules, OneWeb's amended application appears to be a "newly filed application" that reverts to the end of the queue and triggers a new processing round. The Coalition suggested that, at a minimum, the Commission should not consider the Amendment until it has been placed on public notice so that the various procedural and substantive issues presented can be fully considered.

The Coalition also noted its ongoing efforts in the past 22 months to urge the FCC to remove unnecessary regulatory constraints on the 12.2-12.7 GHz band that prevent use of this spectrum for 5G wireless broadband services.⁴

Respectfully submitted,
MVDDS 5G Coalition

⁴ See Petition of MVDDS 5G Coalition for Rulemaking, RM-11768 (filed Apr. 26, 2016) ("12 GHz Band Petition"); see also *Consumer and Governmental Affairs Bureau Reference Information Center Petition for Rulemakings Filed*, Public Notice, RM-11768, Report No. 3042 (CGB May 9, 2016).

<p>Braunston Spectrum LLC</p> <p>By: <u>/s/ Tim Davies</u> PO Box 783066 Wichita, KS 67278 (316) 239-8346</p> <p>Cass Cable TV, Inc.</p> <p>By: <u>/s/ Chad Winters</u> 100 Redbud Road Virginia, IL 62691 (217) 452-4105</p> <p>DISH Network L.L.C.</p> <p>By: <u>/s/ Alison Minea</u> 9601 S. Meridian Boulevard Englewood, CO 80112 202-463-3709</p> <p>GO LONG WIRELESS, LTD.</p> <p>By: <u>/s/ Bruce Fox</u> 4832 Givens Court Sarasota, FL 34242 (941) 349-3500</p> <p>MDS Operations, Inc.</p> <p>By: <u>/s/ Kirk Kirkpatrick</u> 800 SE Lincoln Ave Stuart, FL 34994 (772) 463-8338</p> <p>MVD Number 53 Partners</p> <p>By: <u>/s/ A. Wray Fitch III</u> 6139 Franklin Park Road McLean, VA 22101 (703) 761-5013</p>	<p>Satellite Receivers, Ltd.</p> <p>By: <u>/s/ David R. Charles</u> 1740 Cofrin Drive Green Bay, WI 54302 (920) 432-5777</p> <p>SOUTH.COM LLC</p> <p>By: <u>/s/ Alison Minea</u> 9601 S. Meridian Boulevard Englewood, CO 80112 202-463-3709</p> <p>Story Communications, LLC</p> <p>By: <u>/s/ Bobby Story</u> PO Box 130 Durant, OK 74702 (580) 924-2211</p> <p>Vision Broadband, LLC</p> <p>By: <u>/s/ Patrick McGuinn</u> 145 East 49th Street Hialeah, FL 33013 (202) 255-9011</p> <p>WCS Communications, Inc.</p> <p>By: <u>/s/ Larry Saunders</u> 3562 Knickerbocker Road San Angelo, TX 76904 (512) 794-1198</p>
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cc: Jose Albuquerque, Peter Daronco, Stephen Duall, Jennifer Gilsenan, Nese Guendelsberger, Karl Kensinger, Matthew Pearl, Blaise Scinto, Tom Sullivan, and Troy Tanner