

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

August 18, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

Re: Written *Ex Parte* Notice

The Boeing Company, SAT-LOA-20160622-00058; Call Sign S2966
The Boeing Company, SAT-LOA-20170301-00028; Call Sign S2993
WorldVu Satellites Limited, SAT-LOI-20170301-00031; Call Sign S2994
Audacy Corporation, SAT-LOA-20161115-00117; Call Sign S2982
ViaSat, Inc., SAT-PDR-20161115-00120; Call Sign S2985
Theia Holdings A, Inc., SAT-AMD-20170301-00029; Call Sign S2986

Dear Ms. Dortch:

On August 11, 2017, SES S.A. and its subsidiary O3b Limited (“SES/O3b”) filed reply comments in response to many of the above-captioned license applications urging the Commission to defer action on applications for authority to launch and operate non-geostationary satellite orbit (“NGSO”) systems operating in the fixed-satellite service (“FSS”) in the V-band until “appropriate standards to prevent interference” are in place to protect geostationary (“GSO”) satellite networks that are also expected to operate in the V-band.¹

At least with respect to its own NGSO FSS applications, Boeing respectfully opposes this proposal. As SES/O3b acknowledge, the sharing issue between NGSO and GSO systems in the V-band is currently being studied by ITU Working Groups in preparation for the 2019 World Radiocommunication Conference (“WRC-19”).² Boeing supports the adoption of spectrum sharing mechanisms applicable to NGSO and GSO systems operating in the V-band and representatives from both Boeing and SES/O3b are actively participating in the WRC-19 preparatory process to develop a sharing approach that can be presented to WRC-19 for adoption. Therefore, as previously proposed by Boeing, SES/O3b and others,³ it is sufficient for

¹ See Reply of SES S.A. and O3b Limited, File Nos. SAT-LOI-20170301-00031 *et al.*, at 1 (Aug. 11, 2017).

² See *id.* at 2.

³ See *id.* at 4.

Marlene H. Dortch
August 18, 2017

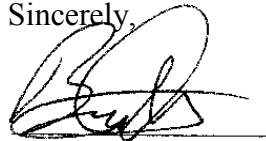
the Commission to condition the grant of licenses issued to NGSO FSS applicants on compliance with the outcome of WRC-19 and on the FCC's adoption of similar rules in the United States.

In contrast, any delay in the processing and grant of the NGSO FSS applications before the Commission would severely prejudice those applicants seeking FCC licenses. Regulators in other countries are actively considering the grant of licenses to NGSO FSS systems that would operate globally in the V-band. This is reflected in the reply comments of SES/O3b, which, ironically, were filed in response to four applications before the Commission, only two of which are seeking an FCC license. The other two applicants have apparently arranged for the grant of a license from other countries and are only seeking authority for U.S. market access.

Given these facts, Boeing urges the Commission to continue to process the NGSO FSS applications before it in an expeditious manner. Prompt grant of these applications is needed to ensure the continued leadership of the United States in the upcoming use of millimeter wave spectrum for broadband satellite communications services that can permanently bridge the digital divide in the United States and in other countries.

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