

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Space Exploration Holdings, LLC) SAT-LOA-20170726-00110; Call Sign S3018
)
NGSO Satellite Application in the)
12.75-13.25 GHz and 19.7-20.2 GHz Bands)

COMMENTS OF SES S.A. AND O3B LIMITED

SES S.A. (“SES”) and its subsidiary O3b Limited (“O3b”), hereby comment on the above-captioned supplemental application from Space Exploration Holdings, LLC (“SpaceX”),¹ which seeks to add frequencies to the non-geostationary orbit (“NGSO”) system SpaceX proposed in an earlier license application.² SES and O3b submitted pleadings regarding the original SpaceX Application, and we incorporate those filings by reference herein.³

The SpaceX Supplement raises the same issues that SES and O3b highlighted in their prior filings on the SpaceX Application:

- The additional spectrum requested in the SpaceX Supplement includes Ka-band frequencies currently used by SES’s geostationary orbit (“GSO”) networks and for which O3b is also seeking U.S. market access for its future NGSO operations.⁴ Should the Commission grant the SpaceX Supplement, the Commission must impose conditions to ensure that the NGSO operations proposed by SpaceX will

¹ *Space Exploration Holdings, LLC*, File No. SAT-LOA-20170726-00110, Call Sign S3018 (the “SpaceX Supplement”).

² *Space Exploration Holdings, LLC*, File No. SAT-LOA-20161115-00118, Call Sign S2983 (the “SpaceX Application”).

³ Comments of SES S.A. and O3b Limited, File Nos. SAT-PDR-20161115-00108 *et al.*, dated June 26, 2017 (“SES/O3b Comments”); Reply of SES S.A. and O3b Limited, File Nos. SAT-PDR-20161115-00108 *et al.*, dated July 14, 2017 (“SES/O3b Reply”).

⁴ *See O3b Limited*, Call Sign S2935, File Nos. SAT-MOD-20160624-00060; SAT-AMD-20161115-00116; & SAT-AMD-20170301-00026.

not interfere with GSO satellites⁵ and will be able to successfully co-exist with other NGSO systems.⁶

- Commission action on SpaceX's request for relief from NGSO system implementation milestones⁷ would be premature at this stage of the application proceedings. The Commission has recently updated its milestone policy for NGSO systems,⁸ and the Commission should decline to address SpaceX's request for pre-emptive relief from the new rules. By deferring consideration of milestone matters, the Commission can take into account actual implementation efforts in determining whether to grant SpaceX additional time for deployment of its proposed system.⁹
- Any grant issued to SpaceX must also include terms and conditions similar to those applied to O3b and other FSS systems.¹⁰

For the foregoing reasons and those set forth in the SES/O3b Comments and the SES/O3b Reply, the Commission should impose appropriate conditions to ensure that operations pursuant to the SpaceX Application and Supplement meet requirements for sharing with both GSO satellites and other NGSO systems. The Commission should hold off acting on milestone

⁵ SES/O3b Comments at 3-6; SES/O3b Reply at 2-4.

⁶ SES/O3b Comments at 6-7.

⁷ SpaceX Supplement, Waiver Requests at 3-5.

⁸ Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters, Report and Order and Further Notice of Proposed Rulemaking, IB Docket No. 16-408, FCC 17-122 (rel. Sept. 27, 2017) ("NGSO Order").

⁹ SES/O3b Comments at 7-8; SES/O3b Reply at 8-9.

¹⁰ SES/O3b Comments at 8-10; SES/O3b Reply at 9-10.

extension requests and should employ its standard condition language in any grants issued in response to the SpaceX filings.

Respectfully submitted,

SES S.A. AND O3B LIMITED

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November, 2017, I caused to be served a true copy of the foregoing “Comments of SES S.A. and O3b Limited” by mail upon the following:

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