

JONES DAY

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August 26, 2016

VIA ELECTRONIC FILING

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

**Re: Oral *Ex Parte* Notice
WorldVu Satellites Limited, Petition for a Declaratory Ruling
Granting Access to the U.S. Market for the OneWeb System
IBFS File No. SAT-LOI-20160428-00041**

Dear Ms. Dortch:

On August 25, 2016, representatives of The Boeing Company (“Boeing”) met with representatives of the International Bureau to discuss the Bureau’s letter to Boeing regarding its pending application for authority to launch and operate a non-geostationary satellite orbit (“NGSO”) fixed-satellite service (“FSS”) system.¹ Participating in the meeting on behalf of the International Bureau were Jose Albuquerque, Diane Garfield, Kathryn Medley, Karl Kensinger, Merissa Velez, Stephen Duall, Kerry Murray, and Chip Fleming. Participating in the meeting on behalf of Boeing were Audrey Allison, Robert Vaughan, Kim Kolb, Stephen Cowen, Carlos Nalda, and the undersigned, with Scott Mills on the telephone.

A portion of the discussion focused on Boeing’s proposal to operate its NGSO FSS system at a nominal altitude of 1,200 kilometers, the same altitude proposed by WorldVu for its OneWeb satellite system. Boeing affirmed its position that “Boeing is confident that OneWeb and Boeing can operate their respective constellations at or near 1,200 kilometers by making slight adjustments upwards or downwards in their planned constellation altitudes.”² The Boeing representatives noted, however, that in order for the Boeing and OneWeb systems to successfully

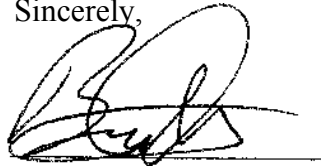
¹ See Letter from Jose P. Albuquerque, Chief, Satellite Division, International Bureau, to Bruce A. Olcott, Jones Day, IBFS File No. SAT-LOA-20160622-00058 (Aug. 16, 2016).

² Comments of The Boeing Company, IBFS File No. SAT-LOI-20160428-00041, at 4 (Aug. 15, 2016).

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operate their constellations at slightly different orbital altitudes, it would be necessary for both operators to undertake “station keeping” measures to control the mean parameters of their respective orbits over the life of their constellations. The Boeing representatives also indicated that this is an issue that should be explored further in the context of an anticipated Notice of Proposed Rulemaking on sharing between NGSO FSS systems.

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

Cc: P. Spector, Counsel to WorldVu
J. Hindin, Counsel to WorldVu