

March 23, 2017

Via Electronic Filing

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

Re: WorldVu Satellites Limited, Petition for a Declaratory Ruling Granting Access to the U.S. Market for the OneWeb System, File No. SAT-LOI-20160428-00041 (Call Sign S2963)

The Boeing Company, Application for Authority to Launch and Operate a Non-Geostationary Low Earth Orbit Satellite System in the Fixed Satellite Service, File Nos. SAT-LOA-20160622-00058 and SAT-AMD-20170301-00030 (Call Sign S2966)

Dear Ms. Dortch:

WorldVu Satellites Limited, d/b/a OneWeb (“OneWeb”) and The Boeing Company (“Boeing”), by their respective counsel, submit this letter to clarify the records of the above-referenced proceedings in which each of OneWeb and Boeing proposed to operate non-geostationary satellite orbit (“NGSO”) systems at a 1,200 km nominal orbital altitude.¹ Each party made clear in previous filings and conversations with the Federal Communications Commission (“FCC” or “Commission”) its willingness to work with the other to ensure that both systems could operate safely.

The parties are pleased to report that on March 1, 2017, Boeing submitted an amendment to the Boeing V-Band Application changing the altitudes of its proposed constellation to 1,082 km,

¹ The Boeing Company, Application for Authority to Launch and Operate a Non-Geostationary Low Earth Orbit Satellite System in the Fixed Satellite Service, File No. SAT-LOA-20160622-00058, Legal Narrative at 34 (filed Jun. 22, 2016) (“Boeing V-Band Application”); Letter from Jennifer D. Hindin, Counsel to OneWeb, to Marlene H. Dortch, Secretary, FCC, re: Ex Parte Notice: WorldVu Satellites Limited, Petition for a Declaratory Ruling Granting Access to the U.S. Market for the OneWeb System, File No. SAT-LOI-20160428-00041 (“OneWeb Ku-Band Application”); The Boeing Company, Application for Authority to Launch and Operate a Non-Geostationary Low Earth Orbit Satellite System in the Fixed Satellite Service, File No. SAT-LOA-20160622-00058, at 1 (filed Sept. 19, 2016); Letter from Jennifer D. Hindin, Counsel to OneWeb, to Marlene H. Dortch, Secretary, FCC, re: Orbital Debris Mitigation Plan, WorldVu Satellites Limited, Petition for a Declaratory Ruling Granting Access to the U.S. Market for the OneWeb System, File No. SAT-LOI-20160428-00041, Attachment at 3 n.10 (filed Nov. 10, 2016).

1,030 km and 970 km.² Accordingly, the OneWeb Ku-Band Application and the Boeing V-Band Application as currently proposed will maintain sufficient separation with respect to orbital altitude.

Please direct any questions on this matter to the undersigned.

Respectfully submitted,

/s/ Brian D. Weimer

Brian D. Weimer
Sheppard Mullin Richter & Hampton
2099 Pennsylvania Avenue NW Suite 100
Washington, DC 20006
(202) 747-1930
Counsel to WorldVu Satellites Limited

/s/ Bruce A. Olcott

Bruce A. Olcott
Jones Day
51 Louisiana Ave. NW
Washington, DC 20001
(202) 879-3630
Counsel to The Boeing Company

cc: Jose Albuquerque
Karl Kensinger
Stephen Duall
Kathryn Medley

² The Boeing Company, Application for Authority to Launch and Operate a Non-Geostationary Low Earth Orbit Satellite System in the Fixed Satellite Service, File No. SAT-AMD-20170301-00030, Legal Narrative at 6 (filed Mar. 1, 2017).