

April 4, 2017

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: IBFS File Nos. SAT-LOI-20160428-00041 and SAT-LOI-20170301-00031

Dear Ms. Dortch:

In the above referenced proceedings, WorldVu Satellites Limited (d/b/a OneWeb) has filed applications for authority to provide satellite services in the United States from a non-geostationary satellite orbit (“NGSO”) system. As required by the Commission’s rules for such applications, OneWeb has supplied information on the ownership and management of the applicant. Under Section 1.65 of the Commission’s rules, OneWeb has an ongoing obligation to ensure the continuing accuracy and completeness of information in its pending applications.

On February 28, 2017, OneWeb and Intelsat announced a merger under which, among other things, (1) OneWeb shareholders will receive Intelsat common shares in exchange for their OneWeb shares, (2) SoftBank Group Corp. (“SoftBank”) will acquire a 39.9% interest in the combined company, and (3) the Board of Directors of the combined company will be made up of seven directors, including three independent directors, three members selected by SoftBank, and one director selected by a current Intelsat shareholder. In addition, it is expected that SoftBank will transfer its interest in the combined company to the SoftBank Vision Fund, which reportedly will include investment from Saudi Arabia’s sovereign wealth fund and other parties yet to be determined.

Obviously, this transaction will have a significant effect on the ownership and management of OneWeb. Yet at present, information about the transaction is available only from press reports. More specifically, none of the information related to this transaction is reflected in the materials filed by OneWeb in either of the applications referenced above – even though OneWeb filed one application and updated ownership information in the other application days after the merger was announced. As a result, the materials currently on file reflect the pre-merger characteristics of OneWeb, and therefore do not provide the Commission and interested parties with information that could be highly relevant to the public interest determination that must be made in each proceeding.

In these circumstances, the Commission should defer consideration of OneWeb's applications. Given the announced merger with Intelsat, it is clear that the information currently on file will soon be inaccurate and any public interest determination made on that record would have to be revisited almost immediately. The Commission would be better served by deferring any action on this application, at least until such time as OneWeb submits for the record complete and accurate information on the Intelsat merger transaction, and specifically the effects it will have on ownership and management of the applicant. Proceeding before such information has been submitted would deprive the Commission of the opportunity to conduct an informed public interest analysis of the applicant as it will be configured going forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tim Hughes".

Tim Hughes
SVP, Global Business & Government Affairs
SpaceX

cc: Tom Sullivan
Jose Albuquerque
Stephen Duall