## **SheppardMullin**

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May 2, 2019

## **VIA IBFS**

Jose P. Albuquerque Chief, Satellite Division International Bureau Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re: Notice Regarding IBFS File Nos. SAT-LOI-20170301-00031, SAT-AMD-20180104-00004 Call Sign S2994

Dear Mr. Albuquerque:

Pursuant to Section 1.65 of the Commission's rules, I write on behalf of WorldVu Satellites Limited ("OneWeb") concerning the processing of its pending V-band Application and V-band Amendment. OneWeb appreciates the tremendous effort the Commission has expended on behalf of OneWeb and other NGSO FSS system proponents in recent years to process applications for access to Ku-band, Ka-band, V-band, and other frequency bands.

OneWeb continues to believe the timing of the V-band Amendment was reasonable and fair based on the significant and material changes made to the Commission's milestone rules after OneWeb filed the V-band Application. OneWeb also recognizes the complexities raised by the V-band Amendment. Given that OneWeb successfully launched its first six LEO satellites on February 27, 2019, OneWeb is naturally ready to begin incorporating the V-band payload into future OneWeb LEO satellites as soon as possible.

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<sup>&</sup>lt;sup>1</sup> See WorldVu Satellites Limited, Petition for Declaratory Ruling Granting Access to the U.S. Market for the OneWeb V-Band System, IBFS File SAT-LOI-20170301-00031 (filed Mar. 1, 2017) (the "V-band Application"). The V-band Application was subsequently amended by the V-band Amendment. See WorldVu Satellites Limited, Amendment to Petition for Declaratory Ruling Granting Access to the U.S. Market for the OneWeb V-Band System, IBFS File SAT-AMD-20180104-00004 (filed Jan. 4, 2018) (the "V-band Amendment").

## **SheppardMullin**

Marlene H. Dortch May 2, 2019 Page 2

To ease the administrative burden on the Commission's International Bureau and in order to expedite access to V-band frequencies for OneWeb, OneWeb hereby affirms that it would accept a V-band authorization issued by the Commission based solely upon the V-band Application and without reference (and without prejudice) to the V-band Amendment at this time.

Please do not hesitate to contact the undersigned with any questions.

Very truly yours,

/s/ Brian D. Weimer

Brian D. Weimer for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Stephen Duall