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May 31, 2018

**EX PARTE**

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

Re: Applications of O3b Limited, IBFS File Nos.  
SAT-MOD-20160624-00060, SAT-AMD-  
20161115-00116, SAT-AMD-20170301-00026,  
and SAT-AMD-20171109-00154

Dear Ms. Dortch:

Earlier today, O3b Limited ("O3b") filed a letter in the above-referenced proceeding in which it summarized discussions it had with Satellite Division staff and legal advisors to Commissioners and Chairman Pai.<sup>1</sup> Among other things, O3b requested that the Commission, in what O3b characterized as "clarification" on a "minor point," "[p]ermit O3b to operate in portions of the 19.3-19.7 GHz and 29.1-29.5 GHz bands on a non-interference basis where there are previous authorized NGSO MSS systems, pending the completion of coordination with such systems."

Iridium Constellation LLC ("Iridium") opposes O3b's request. Granting the request would not "clarify" language in the Draft Order; it would obliterate the language.

Iridium is a "previously authorized NGSO MSS system" in a portion of these bands, and paragraph 46c of the Draft Order states explicitly that until O3b has completed coordination with

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<sup>1</sup> Letter from Suzanne Malloy, Vice-President, Regulatory Affairs, O3b Limited, to Marlene H. Dortch, Secretary, FCC, File Nos. SAT-MOD-20160624-00060, SAT-AMD-20161115-00116, SAT-AMD-20170301-00026, and SAT-AMD-20171109-0015 (May 31, 2018).

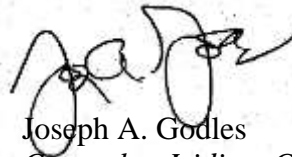
previously authorized systems, it must not transmit or receive in the United States on their frequencies. O3b's proposal would overturn this requirement.

This is not a "minor point." Even if Iridium and O3b were co-primary, and whether O3b is entitled to primary status in these bands is in dispute, a fundamental principle of coordination is that the later entrant must coordinate with the incumbent. And new operations must not begin until coordination is complete, not before coordination even has commenced.

Without coordination, it would be impossible for O3b even to know whether it would be operating "on a non-interference basis." The whole point of coordination is to determine whether interference will occur. Coordination requires the exchange on a confidential basis of detailed, proprietary technical information, including system protection requirements. This information must be reviewed and evaluated by satellite engineers. Permitting O3b to begin transmitting without engaging in these coordination procedures, even on what is ostensibly a non-interference basis, would expose Iridium's operations to harmful interference.

For all these reasons, O3b's request for "clarification" should be denied.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Godles", written over a light gray circular stamp.

Joseph A. Godles  
*Counsel to Iridium Constellation LLC*

cc: Rachael Bender  
Erin McGrath  
Umair Javed  
Will Adams  
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O3b