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April 10, 2019

**VIA IBFS**

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

Re: **Notice of Ex Parte Presentation  
Space Exploration Holdings, LLC; Application for Modification of Authorization  
for the SpaceX NGSO Satellite System; IBFS File No. SAT-MOD-20181108-00083  
WorldVu Satellites Limited; Application for Modification; IBFS File No. SAT-  
MOD-20180319-00022**

Dear Ms. Dortch:

On April 8, 2019, the undersigned, outside counsel to WorldVu Satellites Limited (“OneWeb”) spoke via telephone with Tom Sullivan, Chief of the Commission’s International Bureau.<sup>1</sup>

OneWeb discussed SpaceX’s duty to demonstrate that the SpaceX Modification Application will not result in a substantial increase in interference to other non-geostationary, fixed-satellite systems (“NGSO FSS”) such as OneWeb.<sup>2</sup> OneWeb reiterated that SpaceX has thus far failed to provide the requisite demonstration. OneWeb also noted that while SpaceX has touted “100% demisability for the next iteration of spacecraft design satellites after its initial deployment,” each

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<sup>1</sup> OneWeb attempted to file this Notice of Ex Parte Presentation until midnight on April 10, 2019, but IBFS was down. Consequently, OneWeb filed the Notice of Ex Parte Presentation upon the resumption of the IBFS website’s normal operations on April 11, 2019.

<sup>2</sup> See Application for Modification of Authorization for the SpaceX NGSO Satellite System, IBFS File No. SAT-MOD-20181108-00083 (filed Nov. 8, 2018) (“SpaceX Modification Application”).

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spacecraft in its initial deployment of “fewer than 75 satellites” will contain multiple components that may survive re-entry and become a risk to human populations.<sup>3</sup>

OneWeb concluded by restating its request that the Commission act on the OneWeb Modification Application, which was filed over a year ago, contemporaneously with any action on the SpaceX Modification Application.<sup>4</sup>

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: Tom Sullivan, Chief, International Bureau

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<sup>3</sup> Letter from William M. Wiltshire, Counsel to Space Exploration Holdings, LLC, to Marlene H. Dortch, Secretary, FCC, IBFS File No. SAT-MOD-201801108-00083 at 1 (Mar. 18, 2019); Letter from William M. Wiltshire, Counsel to Space Exploration Holdings, LLC, to Jose Albuquerque, Chief, Satellite Division, IBFS File No. SAT-MOD-201801108-00083 at 5 (Mar. 13, 2019).

<sup>4</sup> See WorldVu Satellites Limited, Application for Modification, IBFS File No. SAT-MOD-20180319-00022 (filed Mar. 19, 2018) (“OneWeb Modification Application”).