

OneWeb

1785 Greensboro Station Place Tower 3
McLean, VA 22102

20 January 2023

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: WorldVu Satellites Limited
File No. SAT-LOI-20160428-00041; Call Sign S2963
Request for Informative Public Notice

Dear Ms. Dortch:

WorldVu Satellites Limited (“OneWeb”) hereby notifies the Commission that, as demonstrated in the attached certification, OneWeb has satisfied the applicable milestone requirements in Section 25.164(b) of the Commission’s rules for its Ku/Ka-band, non-geostationary satellite orbit system.¹ Accordingly, OneWeb respectfully requests release of the surety bond currently on file with the Commission pursuant to Section 25.165(d) by issuing an Informative Public Notice confirming that OneWeb has met the milestones requirements.² This letter is intended to supersede the previous letter submitted on May 20, 2022.

Section 25.164(b) requires NGSO operators to “launch 50 percent of the maximum number of space stations authorized for service, place them in their assigned orbits, and operate them in accordance with the station authorization.”³ To date, OneWeb has launched more than 50 percent of its authorized constellation, placed them in their service orbits, and is operating them in accordance with OneWeb’s Market Access Grant.

¹ See 47 C.F.R. § 25.164(b); WorldVu Satellites Limited, *Petition for a Declaratory Ruling Granting Access to the U.S. Market for the OneWeb NGSO FSS System*, Order and Declaratory Ruling, 32 FCC Rcd 5366, 5379 ¶ 28 (2017) (“Market Access Grant”).

² 47 C.F.R. § 25.165(d).

³ *Id.* at § 25.164(b).

Additionally, OneWeb's pending Modification Application and Amendment Application do not have any bearing on the instant bond certification.⁴ The surety bond is meant to ensure OneWeb deploys the 720-satellite system and utilized the associated Ku/Ka-band frequencies contemplated by the OneWeb Market Access Grant.⁵ When the Modification Application is granted, the Phase 1 system will decrease the number of satellites in its Phase 1 constellation from 720 to 716, thus the milestone would still be met. The Amendment Application only addresses OneWeb's Phase 2 constellation. To the extent the Commission determines a new surety bond is required in connection with OneWeb's Phase 2 constellation, OneWeb will post a new bond consistent with the Commission's rules and any grant of the Modification Application.

Thus, OneWeb respectfully requests the Commission promptly release the OneWeb surety bond pursuant to Section 25.165(d) by issuing an Informative Public Notice confirming that OneWeb has met the milestones requirements.

Please direct any questions concerning this filing to the undersigned.

Very truly yours,

/s/ Blake Wiles

Market Access Manager, North America
OneWeb
bwiles@oneweb.net

Attachment

cc: Karl Kensinger, Division Chief
Merissa Velez
Carolyn Roddy
Clay DeCell

⁴ See *Modification Application of WorldVu Satellites Limited*, File No. SAT-MPL-20200526-00062 (filed May 26, 2020) as amended by *Amendment to Modification Application for U.S. Market Access Grant for the OneWeb Ku- and Ka-Band System*, File No. SAT-APL-20210112-00007 (filed Jan. 12, 2021) ("Modification Application" and "Amendment Application").

⁵ See Market Access Grant, ¶ 28.

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CERTIFICATION

1. I am the Vice President, Spectrum Engineering and Strategy of WorldVu Satellites Limited (“OneWeb”), which is the holder of a Federal Communications Commission (“Commission”) grant of market access for the OneWeb Ku/Ka-band satellite system (Call Sign S2693) (“Market Access Grant”). The Commission’s rules and the Market Access Grant require that OneWeb post a surety bond within 30 days of a grant of market access, that must be escalated annually, until certain milestones are met or the grant is surrendered. OneWeb posted this bond on July 18, 2017 and has escalated it annually in accordance with the Commission’s rules.
2. Between February 2019 and January 2023, OneWeb launched 544 satellites. As of January 2023, 395 of these satellites have been successfully placed in their service orbits, and are operating in accordance with the Market Access Grant. Accordingly, OneWeb has satisfied the milestone requirements set out in Section 25.164(b) within six years of its grant of U.S. market access.
3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/ Kimberly M. Baum

Kimberly M. Baum

Vice President, Spectrum Engineering and Strategy
OneWeb

January 20, 2023