

OneWeb

1785 Greensboro Station Place Tower 3
McLean, VA 22102

January 20, 2023

VIA IBFS

Mr. Karl Kensinger
Division Chief
Federal Communications Commission
45 L Street NE
Washington, D.C. 20554

Re: Notification of 25.118(f) Space Station Repositioning

Dear Mr. Kensinger:

WorldVu Satellites Limited (“OneWeb”), pursuant to 25.118(f) of the Federal Communications Commission’s (the “Commission”), hereby submits this fleet management notification regarding the OneWeb non-geostationary orbit (“NGSO”) system, advising the Commission that some spacecraft will be repositioned within their assigned orbital planes.¹

Consistent with the flexibility the Commission grants NGSO operators to manage fleet operations,² and notwithstanding OneWeb’s prior statements regarding its plans to maintain even spacing among its active satellites,³ OneWeb intends to operate active satellites that are not evenly spaced.⁴ OneWeb herein notifies the Commission of its intent to reposition some of its satellites—in groups of two to three satellites—within their assigned orbital planes at intervals

¹ See 47 C.F.R. § 25.118(f).

² *Id.*; see also *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Report and Order, IB Docket No. 12-267, 28 FCC Rcd 12403, ¶ 114 (2013) (“[W]e adopt a new rule, Section 25.118(f), that allows licensees to reposition NGSO space stations (i.e., adjust their phasing) within previously authorized orbital planes without prior Commission approval.”).

³ See WorldVu Satellites Limited, *Petition for a Declaratory Ruling Granting Access to the U.S. Market for the OneWeb NGSO FSS System*, File No. SAT-LOI-20160428-0004, Schedule S (granted June 23, 2017) (“OneWeb Petition”); see also WorldVu Satellites Limited, *Application to Modify OneWeb NGSO FSS System*, File Nos. SAT-MPL-20200526-00062 & SAT-APL-20210112-00007, Technical Annex at B.8.2 (partially granted Sept. 16, 2022) (“OneWeb Modification Application”).

⁴ See Letter from Suzanne Malloy, Vice President, Regulatory Affairs, O3b Limited to Marlene H. Dortch, Secretary, FCC, File Nos. SAT-MOD-20160624 00060 *et. al.* (Sept. 20, 2018).

that are less than the 7.35° spacing described in the OneWeb market access application.⁵ At no time will the minimum separation between any two spacecraft be less than 1.3° .

The reduced spacing between OneWeb satellites will not increase collision risk.⁶ OneWeb's Flight Dynamics team has conducted extensive analyses and have concluded that the spacecraft can safely operate at the conservative 1.3° spacing. These analyses accounted for multiple risk and safety factors, including: minimum tolerable distance from a service provision perspective, maneuver execution mismodelling (i.e., taking into account potential errors in the modeling of the thrust magnitude), station keeping box size and performance buffer, and the potential need to abort a planned maneuver.

In accordance with 25.118(f), OneWeb certifies that upon completing these orbital adjustments:

- OneWeb will continue to comply with the conditions of its U.S. Market Access grant,⁷ and all applicable Commission rules, including geographic coverage requirements, after the repositioning;
- The repositioning will not increase risk of harmful interference to other systems not permitted by coordination agreements;⁸
- OneWeb will not request increased interference protection because of the repositioning;
- OneWeb will monitor collision risk during the maneuver and take any necessary evasive measures.
- The repositioning does not entail any change of orbital altitude.

/s/ Kimberly M. Baum

Kimberly M. Baum

Vice President, Spectrum Engineering and Strategy
OneWeb

⁵ See OneWeb Petition Schedule S Tech Report at 2-21; see OneWeb Modification Application Schedule S Tech Report at 5-42.

⁶ Report and Order, ¶ 114; see also 47 C.F.R. § 25.118(f)(4)

⁷ See 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 (2017).

⁸OneWeb notes its coordination agreements were reached under footnote US334 of the United States Table of Frequency Allocations and it will continue to operate in a manner consistent with those agreements.