## LATHAM & WATKINS LLP

November 20, 2014

## VIA ELECTRONIC FILING IN IBFS

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 555 Eleventh Street, N.W., Suite 1000 Washington, D.C. 20004-1304 Tel: +1.202.637.2200 Fax: +1.202.637.2201

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Re: Notice of *Ex Parte* Presentation, Inmarsat Hawaii Inc., IBFS File No.

SES-LIC-20120426-00397; SES-AMD-20120823-00781; Call Sign

E120072

Dear Ms. Dortch:

On November 18, 2014, Peter Hadinger and Chris Murphy of Inmarsat, Inc. ("Inmarsat"), Giselle Creeser of GC Consulting Inc., and John Janka and Elizabeth Park of Latham & Watkins LLP, met with Jose Albuquerque, Karl Kensinger, Stephen Duall, Kathyrn Medley, Alyssa Roberts, Kal Krautkramer, Chip Fleming and Paul Blais of the International Bureau. Separately, Miriam Murphy of Inmarsat, Mr. Murphy, Ms. Creeser and Mr. Janka met with Renee Gregory from Chairman Wheeler's office. During each meeting, the Inmarsat representatives discussed the above-referenced application for a gateway antenna located in Lino Lakes, Minnesota, and market access for the Inmarsat-5 F2 satellite ("ISF2") at 55° W.L. (the "Application").

Specifically, Inmarsat provided a status update on the expected January launch of I5F2 and reiterated the analysis set forth in the Application and in its Opposition to Iridium's Petition to Deny. Namely, there is no dispute regarding the technical compatibility of Inmarsat's proposed operations in the 19.4-19.6 GHz and 29.1-29.25 GHz band segments, and there is no technical reason not to provide Inmarsat the waiver required to allow it to operate on a non-interference basis in these band segments in the United States. In fact, Inmarsat's proposed operations at Lino Lakes would occur within the very same spectrum sharing "envelope" within which I5F2's operations otherwise would be conducted without regard to the Application. Moreover, facilitating spectrum sharing on a non-harmful interference basis in underutilized spectrum, and in the absence of any showing of technical incompatibility, is fully consistent with

Inmarsat Hawaii Inc., Opposition to Petition to Deny of Iridium Satellite LLC, File Nos. SES-LIC-20120426-00397; SES-AMD-20120823-00781, Call Sign E120072, at 5-8 (filed Oct. 9, 2012).

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Commission policy. Inmarsat urged the Commission to grant the Application expeditiously given the imminent launch of I5F2.

If you have any questions regarding this submission, please feel free to contact the undersigned.

Respectfully submitted,

/s/

John P. Janka Elizabeth R. Park

cc: Renee Gregory
Jose Albuquerque
Karl Kensinger
Stephen Duall
Kathyrn Medley
Alyssa Roberts
Kal Krautkramer
Chip Fleming
Paul Blais

Donna Bethea Murphy, Iridium Joseph Godles, Goldberg, Godles, Wiener & Wright