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August 28, 2017

VIA ELECTRONIC FILING

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

Re: Request to Designate Proceeding as “Permit But Disclose”

Iridium Satellite LLC, IBFS File Nos. SES-MOD-20170413-00388 and SES-AMD-2017072600812

Iridium Carrier Services LLC, IBFS File Nos. SES-MOD-20170413-00389 and SES-AMD-20170726-00813

Dear Ms. Dortch:

In the above-referenced applications (collectively, the “Iridium Applications”), Iridium Satellite LLC and Iridium Carrier Services LLC (collectively, “Iridium”) seek to modify their existing authority to operate in the 1.6 GHz portion of the Big LEO band. Ligado Networks Subsidiary LLC (“Ligado”), which is authorized to operate in adjacent L-band spectrum, has concerns with respect to certain aspects of the Iridium Applications. Ligado plans to describe those concerns in a formal submission to the Commission in due course.¹

Pursuant to Section 1.1206 of the Commission’s rules,² Ligado respectfully requests that the Commission designate the *ex parte* status of the Iridium Application proceedings as “permit but disclose.” The Commission has discretion to modify the *ex parte* status of a proceeding

¹ Accordingly, Ligado is a “party” to the Iridium Application proceedings under the Commission’s *ex parte* rules. See 47 CFR § 1.202(d) (clarifying that any person “filing a written submission referencing and regarding [a] pending [application] which is served on the filer” should be treated as a “party” under the Commission’s *ex parte* rules).

² 47 CFR § 1.1206.

where, as here, the public interest warrants doing so.³ Grant of this request would facilitate the ability of all interested parties to meet with Commission staff to discuss the important issues presented by the Iridium Applications and would be consistent with Commission precedent involving other similar application proceedings.⁴

Please contact the undersigned should you have any questions in this matter.

Respectfully submitted,

/s/ John P. Janka

John P. Janka

Jarrett S. Taubman

Counsel to Ligado Networks Subsidiary LLC

cc: Jose Albuquerque
Paul Blais
Joseph A. Godles, Counsel to Iridium

³ 47 C.F.R. § 1.1200(a).

⁴ *See, e.g., Satellite Communications Services Information re: Actions Taken*, Public Notice, Rept. No. SES-01466 at 4 (rel. July 11, 2012) (informative release designating HNS License Sub, LLC earth station application proceedings as “permit-but-disclose” to facilitate communications with the parties).