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VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Attn: Satellite Division, International Bureau

Re: Earth Station License Conditions
SES-MOD-20140814-00652 (call sign E100088)
SES-MOD-20140814-00654 (call sign E130021)
SES-MOD-20140814-00655 (call sign E130098)

Dear Ms. Dortch:

The above-referenced earth station modification applications filed by O3b Limited ("O3b") request modification to earth station licenses that authorize communication with O3b's space stations. For the reasons stated below, O3b requests that the Commission consider modifying or removing certain license conditions when it acts upon these earth station modification applications.

O3b has been granted access to the U.S. market via earth station licenses that specify O3b's UK-licensed space stations as points of communication. Because the earth station licenses provide market access for O3b's space stations, the earth station licenses include conditions relating to the space stations in addition to including conditions relating to the earth stations.

O3b has filed a Petition for Declaratory Ruling in which it: (i) requests access to the U.S. market for four new satellites O3b will be launching; and (ii) for administrative convenience, requests consolidation of the U.S. market access authority for its already-operating satellites with the U.S. market access authority for its four new satellites. Once these requests are granted, O3b will have a single authorization, independent of any earth station licenses, that will provide access to the U.S. market for its space station constellation.

Upon action on the Petition for Declaratory Ruling, therefore, the conditions in the above-mentioned earth stations that relate to O3b's space stations will become unnecessary. The space station matters addressed by the conditions will at that point be covered by the conditions associated with O3b's space station market access authorization. Accordingly, O3b asks that the Commission review earth station license conditions listed in Attachment A, and modify or remove them as appropriate, when it acts on the above-referenced earth station modification applications.

Please direct any questions to the undersigned.

Sincerely,

 /s/ Suzanne Malloy

Suzanne Malloy

Vice-President, Regulatory Affairs

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Attachment A

E100088 (Hawaii) Conditions #	E130021 (Texas) Conditions #	E130098 (Maritime) Conditions #	Description
90033	90089	-	Transmissions are limited to TT&C/GW; prohibition against operation with any other earth station
90035	90035	90035	Ephemeris data
90036	90083	6610	Ka band plan waiver: limitations on downlink transmissions
90037	90084	-	PFD limits for space stations
90038	90085	6607	Completion of coordination with Federal systems (space station obligation)
90041	90041	90041	Cross-pol waiver
90043	90043	90043	Processing rounds
90044	90044	6597	Service area coverage requirement
90045	90045	6598	Orbital debris
90047	90088	6608	Milestones
90048	90048	90075	30 days to decline the authorization