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December 9, 2010

VIA ELECTRONIC FILING

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

Attn: Satellite Division, International Bureau

Re: O3b Limited, Application for Authority to Operate a Gateway Earth Station in Haleiwa, Hawaii, with a U.K.-licensed Non-geostationary Ka-band Satellite System; SES-LIC-20100723-00952; Call Sign E100088

Dear Ms. Dortch:

Pursuant to Section 1.65 of the Commission's rules, 47 C.F.R. § 1.65, O3b Limited ("O3b"), by its counsel, hereby updates the information furnished in IBFS File No. SES-LIC-20100723-00952 (the "Application") for continuing accuracy and completeness.

1. Updated O3b Ownership and Officers

On November 29, 2010, O3b completed a new financing round by raising a total of US \$1.2 billion from a group of investors and banks which will take the company through service launch and beyond. As a result of this new financing, the ownership and officers of O3b have changed. A revised Exhibit B to the Form 312 with updated ownership and officers information is attached hereto as Attachment A.

2. Updated O3b Anticipated Launch and Service Dates

Based on this new financing, O3b anticipates that its first satellites will be launched and that commercial service will begin by June 2013. This information updates the estimated launch and service dates on pages 2 and 14 of the Legal Narrative. In addition, the

Marlene H. Dortch
December 9, 2010
Page 2

estimated construction, launch and service dates in Section S.1 of Schedule S of the Application are updated as follows:

- Estimated Date of Placement Into Service – 6/1/2013
- Construction Commencement Date – 12/15/2008 (unchanged)
- Construction Completion Date – 4/15/2013
- Estimated Launch Date Begin – 2/1/2013
- Estimated Launch Date End – 6/30/2013

For purposes of O3b's request to operate in the 18.3-18.6 GHz band, this means that the O3b system will be operational *after* the co-primary FS allocation in the 18.3-18.58 GHz band expires on November 19, 2012. *See* Application, Legal Narrative, at 14.

3. Updated Form 312, Schedule B, Emission Designators

For each Emission Designator included in Column E47 of Schedule B to Form 312 (pages 14 to 18) of the Application, as applicable, the fifth character "X" should be changed to "G" as follows:

- 216MX7D** should be changed to **216MG7D**, each time it occurs
- 307KX7D** should be changed to **307KG7D**, each time it occurs
- 40M0X7D** should be changed to **40M0G7D**, each time it occurs

4. Updated Interference Analysis and Frequency Coordination

Attached hereto as Attachment B is a letter dated November 29, 2010, which clarifies that Comsearch conducted a terrestrial interference analysis and coordinated the frequencies within the range of 17300-20200 MHz and 27600-29100 MHz, covering the entire range of frequencies requested by O3b in the Application. The attached letter supplements the Comsearch Interference Analysis and Comsearch Frequency Coordination Reports attached as Exhibit 1 and Exhibit 2, respectively, to Appendix B to Attachment A, *Technical Information to Supplement Schedule S* (the "Technical Attachment"), submitted with the Application.

5. Updated Coordination Status with U.S. Government Satellite Networks

O3b clarifies that it has completed coordination of the O3b system with co-frequency U.S. government satellite networks as required under the International Telecommunication Union Radio Regulations, and understands that it will need to separately coordinate with U.S. government satellite networks under Footnote US334 of the U.S. Table of Allocations once the Application is granted and a license has been issued. This information updates Section A. 12 of the Technical Attachment.

Marlene H. Dortch
December 9, 2010
Page 3

Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Weimer', with a stylized flourish at the end.

Brian D. Weimer

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: (by electronic mail)

Marlene Dortch
Mindel De La Torre
Roderick Porter
Robert Nelson
Cassandra Thomas
Fern Jarmulneck
Stephen Duall
Kathryn Medley
Kal Krautkramer
Chip Fleming
Karl Kensinger
Paul Blais
Shahnaz Ghavami

Attachment A

LIST OF STOCKHOLDERS, OFFICERS AND DIRECTORS
(Response to Item 40)

**LIST OF STOCKHOLDERS, OFFICERS AND DIRECTORS
 (Response to Item 40)**

The applicant, O3b Limited, is a Jersey, Channel Islands company ("O3b Limited"). O3b Limited is a direct wholly-owned subsidiary of O3b Networks Limited, also a Jersey, Channel Islands company ("O3b Networks Limited"). O3b Networks USA, LLC, a Nevada limited liability company ("O3b Networks USA"), is a direct majority-owned subsidiary of O3b Limited and has offices in Englewood, Colorado. See attached organizational chart.

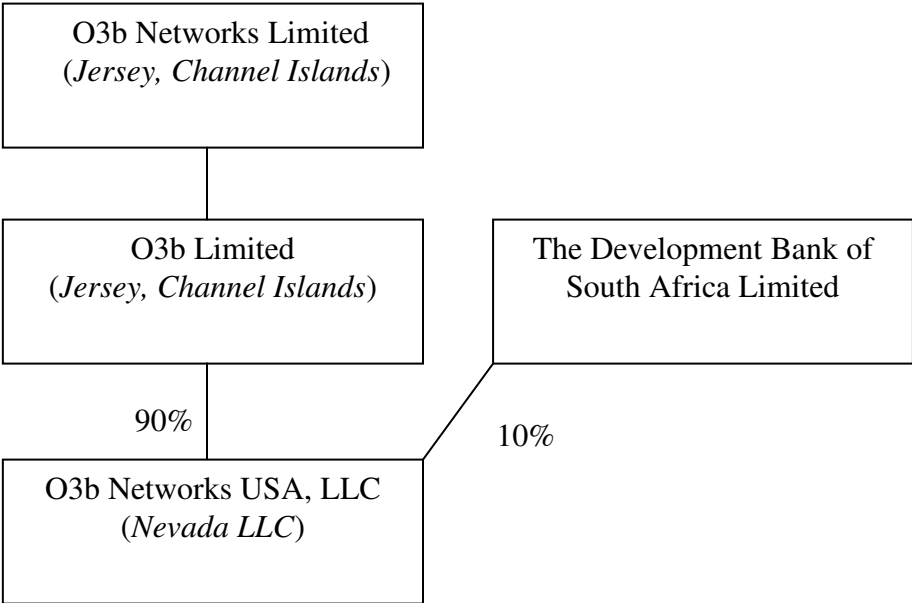
The address for O3b Limited and its parent company, O3b Networks Limited, is St. John's Manor Offices, Le Neuf Chemin, St. John, JE34EH, Jersey. The address for O3b Networks USA is 8900 Liberty Circle, Englewood, Colorado, 80112.

The following individuals serve as officers and directors of O3b Limited and can be contacted through either of the addresses listed above:

Name	Title	Nationality
Mark Rigolle	Chief Executive Officer	Belgian
Jonas Mattsson	Chief Financial Officer	Swedish
William Lawrence	Executive Vice President and General Counsel	U.S.
John Finney	Executive Vice President – Sales and Marketing	British
Brian Holz	Chief Technology Officer	U.S.
Christian Patouraux	Chief Product Development Officer	Dual French/Belgian
John W. Dick	Chairman of the Board, Company Secretary	Canadian
Romain Bausch	Vice-Chairman of the Board	Luxembourg
Steve G. Collar	Director	British
Christophe De Hauwer	Director	Belgian
Martin Halliwell	Director	British
Andrew Browne	Director	Dual Irish/U.S.
Paul Gould	Director	U.S.
John Gowen	Director	U.S.
Larry J. Adler	Director	U.S.
Sajjad Sabur	Director	British
Richard J. Cole	Director	British
James Goldstein	Director	U.S.
Moez Daya	Director	Dual Kenyan/British
Victor Casier	Director	Belgian
Jayne Bayliss	Assistant Company Secretary	British

The names, addresses, and citizenship of stockholders owning of record and/or voting 10 percent or more of O3b Networks Limited voting stock are: (1) SES Finance Services AG, a Switzerland company, with a registered address at *c/o* Acton Treuhand AG, Innere Gueterstrasse 4, CH-6304 Zug Switzerland, which holds 37.15% of the voting shares of O3b Networks Limited; (2) LGI Ventures, B.V., a Netherlands company and an affiliate of Liberty Global, with a registered address at 53 Boeing Avenue, 1119 PE Schiphol Rijk, Amsterdam, 1070 BT, The Netherlands, which holds 14.69% of the voting shares of O3b Networks Limited; and (3) HSBC Investment Bank Holdings plc, a United Kingdom Company, with a registered address at 8 Canada Square, London England E14 5HQ, which holds 16.42% of the voting shares of O3b Networks Limited.

O3b OWNERSHIP CHART



Attachment B

COMSEARCH LETTER REGARDING FREQUENCY COORDINATION



November 29, 2010

Mr. Gary Mattie
O3B
gary.mattie@o3bnetworks.com

Re: Hawaii Gateway
Haleiwa, Hawaii
Ka-band Transmit/Receive earth Station
Range of Frequencies

Dear Mr. Mattie,

This letter is confirmation that your 7.3 Meter earth station that was coordinated by Comsearch on 04-20-2010 considered all licensed and coordinated terrestrial microwave paths and local multipoint distribution service (LMDS) incumbents with operating frequencies within the range of 17300 – 20200 MHz and 27600 – 29100 MHz.

The Coordination Notices issued by Comsearch were issued to all operators within these bands.

Please let us know if you have any questions, or require additional information on this earth station.

Sincerely,

Comsearch

A handwritten signature in black ink, appearing to read 'Gary Edwards', written over a horizontal line.

Gary Edwards
Manager Satellite Services
(703) 726-5662
gedwards@comsearch.com