

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: O3b Limited
IBFS File No. SES-LIC-20180122-00053
Call Sign: E180005

Dear Ms. Dortch:

Pursuant to ongoing communications with the Commission's Satellite Division, O3b Limited ("O3b") hereby seeks correction of the license conditions for its E180005 earth station to specify that O3b met the standards of Section 25.136(a) of the Commission's rules and that O3b is not required to protect future Upper Microwave Flexible Use Service ("UMFUS") deployments in the 27.6-28.35 GHz band.

In its application for this earth station, O3b made a showing pursuant to 47 C.F.R. § 25.136(a), which describes the circumstances that allow an earth station licensee to operate without being obligated to protect UMFUS stations. *See* File No. SES-LIC-20180122-00053 (the "E180005 Application"), granted March 8, 2018. Specifically, Attachment 3 to this application entitled "Compliance with 47 C.F.R. § 25.136(a)(4)" demonstrated that the E180005 earth station satisfies the criteria in 47 C.F.R. § 25.136(a)(4) and is therefore qualified to operate without providing interference protection to UMFUS stations.

The terms of Section 25.136(a) specify that "an applicant for a license for a transmitting earth station in the 27.5-28.35 GHz band that meets one of the following criteria may be authorized to operate without providing interference protection to stations in the Upper Microwave Flexible Use Service."¹ As noted in Attachment 3, E180005 meets the thresholds delineated in Section 25.136(a)(4)(i-iv) to be granted this status.²

Notwithstanding this showing, the grant of the E180005 application states that O3b must not cause harmful interference to any UMFUS operations in the 27.6-28.35 GHz band and that it must terminate transmission upon notification of harmful interference. Specifically, the license includes condition 90441, which states that:

¹ 47 C.F.R. § 25.136(a).

² Section 47 C.F.R. § 25.136(a)(4)(iv) of the rules requires successful completion of frequency coordination with UMFUS licensees within the area in which the earth station generates a specified power flux density.

Operations in the 27.6-28.35 GHz band are on a secondary basis to the Upper Microwave Flexible Use Service (UMFUS). The licensee must not cause harmful interference to any UMFUS operations in the 27.6-28.35 GHz band, must accept interference from these operations, and must terminate transmissions on the affected frequencies immediately upon notification of harmful interference.

The above condition does not reflect the status in the 27.6-28.35 GHz band applicable to earth stations that meet the Section 25.136(a)(4) criteria. To accurately set forth the status requested in its application, O3b requests that the Commission correct condition 90441. For example, the Commission could modify the condition by deleting the second sentence and replacing it with the underlined language below so that it would read as follows:

Operations in the 27.6-28.35 GHz band are on a secondary basis to the Upper Microwave Flexible Use Service (UMFUS). Notwithstanding that status, pursuant to Section 25.136(a) the licensee is authorized to operate without providing interference protection to stations in the Upper Microwave Flexible Use Service.

This adjustment to the E180005 license conforms to the language of Section 25.136(a) and will serve the public interest by authorizing O3b operations at its earth station consistent with Commission policies.

Respectfully submitted,

/s/ Suzanne Malloy
Vice President of Regulatory Affairs
O3b Limited
900 17th Street NW, Suite 300
Washington, DC 20006

May 3, 2018