



beyond frontiers

January 28, 2021

VIA IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, D.C. 20554

**Re: O3b Limited Application for Hawaii mPOWER Gateway Earth Station
Call Sign E202133, File No. SES-LIC-20200721-00777**

Dear Ms. Dortch:

O3b Limited (“O3b”), pursuant to Section 1.65 of the Commission’s rules, 47 C.F.R. § 1.65, updates the record regarding the above-referenced O3b application for a gateway earth station in Hawaii to support the next-generation O3b mPOWER non-geostationary satellite orbit constellation (the “Hawaii Application”). Specifically, O3b hereby clarifies that the parameters for its planned operations in the 29.1-29.3 GHz and 19.4-19.6 GHz bands will conform to O3b’s recently completed coordination agreement with Iridium, consistent with Section 25.275 of the Commission’s rules, 47 C.F.R. § 25.275.

In the narrative of the Hawaii Application, O3b discussed its proposal to use the 29.1-29.3 GHz and 19.4-19.6 GHz bands for Mobile-Satellite Service feeder links on a shared, co-primary basis with the existing Iridium operations in that spectrum.¹ Pursuant to Sections 25.203(k) and 25.250 of the Commission’s rules, 47 C.F.R. §§ 25.203(k) and 25.250, O3b and Iridium have now completed frequency coordination between the Iridium system and the O3b Hawaii mPOWER gateway earth station, agreeing that the technical parameters specified in the coordination documents achieve compatibility between the two systems.

O3b hereby confirms that its proposed operations in the 29.1-29.3 GHz and 19.4-19.6 GHz bands will comply with the technical parameters included in the frequency coordination agreement. O3b will not exceed those discussed parameters without agreement from Iridium, regardless of whether the license authorizes higher maximum operating parameters.

O3b’s commitment in this regard is consistent with the express terms of Section 25.275. That rule makes clear that a Part 25 license will typically identify the outer limits of the operating authority envelope, including the most potentially interfering transmit carriers² and the most

¹ Hawaii Application, Narrative at 3-4, 6.

² See 47 C.F.R. § 25.275(c) (“A license for a transmitting earth station will normally specify only the r.f. carriers having the highest e.i.r.p. density, the narrowest bandwidth, and the largest bandwidth authorized for transmission from that station. Unless otherwise specified in the station

sensitive receive carriers,³ but will permit the use of any carrier encompassed within those outer limits. Moreover, the rule expressly provides that operating characteristics “shall be selected by the licensee to avoid unacceptable levels of interference being caused to other earth, space or terrestrial stations” and that any coordination agreements “concerning specific frequency usage constraints … are considered to be conditions of the station authorization.”⁴

In accordance with Section 25.275, O3b identified in the Form 312 Schedule B the extreme operational limits for the broader range of frequencies covered by the Hawaii Application. O3b recognizes, however, that its actual operating levels in specific band segments must be tailored to control interference to other parties. In particular, O3b acknowledges its obligation to conform to the parameters set forth in the coordination agreement with Iridium for the 29.1-29.3 GHz and 19.4-19.6 GHz bands, and O3b will operate its Hawaii gateway in compliance with those limits.

O3b requests that the Commission update the record regarding the Hawaii Application to incorporate this additional information. Please address any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Suzanne Malloy

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authorization, the licensee is authorized to transmit any other type of carrier not specifically listed which does not exceed the highest e.i.r.p., e.i.r.p. density and bandwidth prescribed for any listed emission.”).

³ See 47 C.F.R. § 25.275(d) (“Only the most sensitive emission(s) for which protection is being afforded from interference in the authorized receive frequency band(s) will be specified in the station authorization.”).

⁴ 47 C.F.R. § 25.275(b).