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August 18, 2014

FILED ELECTRONICALLY

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals Building
445 12th Street, S.W. TW-A325
Washington, D.C. 20554

**Re: O3b Limited
Eight Satellites Into Operation Milestone
Notification
Request for Informative Public Notice
Call Sign E100088**

Dear Ms. Dortch:

On September 25, 2012, the Commission issued a license (the "Hawaii Gateway License") authorizing O3b Limited ("O3b") to operate a gateway earth station located in Hawaii to communicate with O3b's non-geostationary satellite orbit ("NGSO") space stations.¹ The grant of O3b's application for the Hawaii Gateway License was conditioned on O3b posting a \$2 million performance bond assuring compliance with two FCC milestones, the first of which is that O3b launch and place its first NGSO space station into operation within one year of grant, *i.e.*, by September 25, 2013,² and the

¹ See File No. SES-LIC-20100723-00952, Call Sign E100088.

² Hawaii Gateway License, condition 90047. The Commission's rules establish five milestones for NGSO systems; require NGSO licensees to post a \$5 million performance bond covering the five milestones; and provide that the bond amount may be reduced by \$1 million each time a milestone is satisfied. See 47 C.F.R. §§ 25.164(b), 25.165(a)(1), and 25.165(d). O3b already had satisfied the first three milestones by the

second and final of which is that O3b bring eight satellites into operation within three years, six months of grant (*i.e.*, by March 25, 2016).³ O3b filed a copy of its bond with the Commission on October 24, 2012.⁴

Pursuant to Sections 25.145(f)(iv), 25.164(b)(4), and 25.165(d) of the Commission's rules,⁵ O3b previously provided a certification that it had satisfied the first milestone on July 3, 2013. The Commission issued an Informative Public Notice on July 31, 2014, stating that O3b had met the first milestone to launch and place into operation the first satellite in its NGSO satellite system.

Pursuant to Sections 25.145(f)(iv), 25.164(b)(4), and 25.165(d) of the Commission's rules,⁶ O3b hereby provides the attached certification that it has satisfied the second and final FCC milestone. O3b launched its first four satellites on June 25, 2013 and its second four satellites on July 10, 2014. These eight satellites have been placed in their authorized non-geostationary orbit, and in-orbit operation of the space stations has been tested and found to be consistent with the terms of O3b's authorization.⁷ Accordingly, O3b has brought eight satellites into operation, which satisfies the final FCC milestone.

O3b respectfully requests that the Commission issue an Informative Public Notice confirming that O3b has met this milestone and that, in accordance with Section 25.165(d), the amount of O3b's bond may be reduced by the remaining One Million Dollars.

time the Hawaii Gateway License was issued. *See* Letter, dated April 23, 2012, from Brian D. Weimer, counsel to O3b, to Marlene H. Dortch, Secretary, FCC, File No. SES-LIC-20100723-00952.

³ Hawaii Gateway License, condition 90047.

⁴ *See* File No. SES-LIC-20100723-00952.

⁵ 47 C.F.R. §§ 25.145(f) (iv), 25.164(b)(4), and 25.165(d).

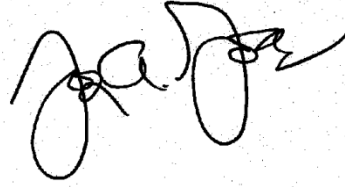
⁶ 47 C.F.R. §§ 25.145(f) (iv), 25.164(b)(4), and 25.165(d).

⁷ On August 15, 2014, the Commission granted special temporary authority giving O3b the flexibility to operate up to two of its satellites as in-orbit spares. *See* FCC File Nos. SES-STA-20140814-00656, SES-STA-20140814-00657, and SES-STA-20140814-00658.

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Please direct any questions concerning this filing to the undersigned.

Respectfully submitted,

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

Joseph A. Godles
Attorney for O3b Limited

cc: Joslyn Read, O3b Limited

CERTIFICATION

1. I am the Chief Architect of O3b Limited ("O3b"), which is the holder of an FCC gateway earth station license (the "Hawaii Gateway License"), Call Sign E100088, that is subject to two milestone conditions. In July 2013, the Commission found that O3b had satisfied the first of the two conditions by launching and placing into operation the first satellite in its NGSO satellite system. O3b has now satisfied the second and final of the two milestone conditions, which is to bring eight O3b satellites into operation within three years, six months of grant (*i.e.*, by March 25, 2016).
2. The first four O3b satellites were launched on June 25, 2013, and the second four O3b satellites were launched on July 10, 2014. These eight satellites have been placed in their authorized non-geostationary orbit, and in-orbit operation of the space stations has been tested and found to be consistent with the terms of O3b's authorization. Accordingly, O3b has brought eight satellites into operation, which satisfies the second and final milestone condition of the Hawaii Gateway License.
3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



18 Aug 2014

Jim Mowat
Vice President and
Chief Architect

August 18, 2014