

16 January 2018

FILED ELECTRONICALLY VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Re : Iridium Satellite LLC,
File Nos. SES-MOD-20170413-00388, SES-AMD-20170726-00812
Iridium Carrier Services LLC,
File Nos. SES-MOD-20170413-00389, SES-AMD-20170726-00813*

Dear Ms. Dortch:

On 11 January 2018, Maureen C. McLaughlin, Vice President of Public Policy for Iridium Satellite LLC and Iridium Carrier Services LLC (collectively, “Iridium”), Scott Blake Harris and Shiva Goel of Harris, Wiltshire & Grannis LLP, Brandon Hinton of Spectrum Analysis, LLC, Joe Godles of Goldberg, Godles, Weiner & Wright, and Patrick Halley of Wilkinson Barker Knauer LLP met with Thomas Sullivan, Troy Tanner, Jose Albuquerque, Jennifer Gilsean, Kerry Murray, Karl Kensinger, Paul Blais, and Cindy Spiers, of the International Bureau. We discussed the above-noted applications.

We explained that the Iridium Certus terminals were specifically designed to take advantage of the higher data rates of the Iridium NEXT satellites – 40 of which are already in orbit. We also noted that the planned commercial launch of Iridium Certus service is rapidly approaching. We then made the following points about the pending applications:

- 1) *No one has petitioned to deny the applications.*
- 2) *The Iridium Certus terminals comply with all applicable FCC power limits and out-of-band emissions (“OOBE”) limits. There is no evidence in the record to the contrary.*
- 3) The record shows that Iridium Certus terminals cannot possibly interfere with Ligado satellites; Ligado’s own MSS signals are more than 4200 times more powerful than OOBE from Iridium Certus terminals.
- 4) Iridium Certus terminals, just like Iridium’s legacy terminals, satisfy the OOBE limits specified in the Commission’s rules for the protection of GPS. Indeed, the unrefuted record reflects that the Iridium Certus prototype complies with the Section 25.216 OOBE limits with greater than 10 dB of margin.

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5) Nothing that Iridium has argued in any other proceeding is inconsistent with the positions it has taken or the arguments it has made in this proceeding.¹

We did not discuss the merits or outcome of any other Commission proceeding.

Please let me know if you have any questions.

A handwritten signature in black ink that reads "SCOTT HARRIS". The signature is written in a cursive, slightly stylized font.

Scott Blake Harris

Counsel to Iridium

cc:

Thomas Sullivan

Troy Tanner

Jose Albuquerque

Jennifer Gilsonan

Kerry Murray

Karl Kensinger

Paul Blais

Cindy Spiers

¹ See Letter from Joseph A. Godles, Counsel to Iridium, to Marlene H. Dortch, Secretary, Federal Communications Commission, SES-MOD-20170413-00388, SES-AMD-20170726-00812, SES-MOD-20170413-00389, SES-AMD-20170726-00813, SES-MOD-20151231-00981, SAT-MOD-20151231-00090, SAT-MOD-20151231-00091, IB Docket No. 11-109, RM-11681 (filed Jan. 9, 2017) (explaining that Iridium “has been completely consistent” in advocating for the grant of the Iridium Certus applications).