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August 14, 2017

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

Re: HNS License Sub, LLC
Request for Special Temporary Authority
File No. SES-STA-20170721-00792
Application for Modification of Blanket License
File No. SES-MOD-20170726-00811, Call Sign E060445

Dear Ms. Dortch:

Iridium Constellation LLC ("Iridium") is writing to address one aspect of the above-referenced filings.

In the first of the above-referenced filings, submitted on July 21, 2017, HNS License Sub, LLC ("HNS") requested Special Temporary Authority to operate up to 100,000 0.9m GSO FSS terminals to communicate with five specified space stations on various Ka-band frequencies. The STA request was granted 10 days later, on July 31, 2017, and the grant was announced in a public notice dated August 9, 2017.¹ In the second of the above-referenced filings, submitted on July 26, 2017, HNS requested modification of its blanket license to add authority for the up to 100,000 0.9m terminals that were the subject of its STA request.²

¹ See Public Notice, Report No. SES-01981, Satellite Communications Services Information (Actions Taken), p. 9.

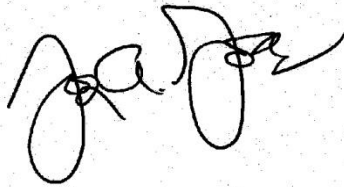
² See File No. SES-MOD-20170726-00811.

The frequencies covered by HNS' STA request and its modification application include the 29.25-29.3 GHz band, which is shared on a co-primary basis between the geostationary orbit fixed-satellite service ("GSO FSS") and the non-geostationary orbit fixed-satellite service ("NGSO FSS"). Iridium operates NGSO FSS feeder link earth stations in this band. HNS stated in both its STA request and its modification application that Iridium's operations in the band would be protected because HNS would comply with a coordination agreement with Iridium.³

Please be advised that Iridium disagrees with HNS' statements as to protection of Iridium's feeder links. Iridium will provide a fuller explanation within the 30-day comment period for HNS' modification application.⁴ In the interim, Iridium assumes that, consistent with the Commission's policies, any HNS operations pursuant to its STA will be on a secondary, non-interference basis. And in light of the issues with protection of its feeder links, Iridium is opposed to any extension of HNS' STA.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Godles", is centered on the page. The signature is fluid and cursive.

Joseph A. Godles
Attorney for Iridium Constellation LLC

cc: Jennifer A. Manner, HNS

³ See HNS' STA request, Narrative at n. 6; HNS' modification application, Narrative at n. 4.

⁴ See Public Notice, Report No. SES-01978, Satellite Communications Services (Satellite Radio Applications Accepted for Filing), p. 24.