

October 13, 2017

Ex Parte

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

Re: Amendment of Parts 2 and 25 of the Commission's Rules to Facilitate the Use of Earth Stations in Motion Communicating with Geostationary Orbit Space Stations in Frequency Bands Allocated to the Fixed Satellite Service; IB Docket No. 17-95

Dear Ms. Dortch:

On October 11, 2017, Maureen C. McLaughlin, Vice President of Public Policy for Iridium Communications, Inc. ("Iridium"), Brandon Hinton of Wiley Rein LLP, and Shiva Goel and I of Harris, Wiltshire & Grannis LLP met with Rachel Bender of Chairman Pai's Office, and separately with Louis Peraertz of Commissioner Clyburn's office. On October 12, 2017, we met with Kevin Holmes of Commissioner Carr's office.

In each meeting, we expressed Iridium's support for the Commission's proposal to create additional spectrum for earth stations in motion ("ESIMs"), but urged the Commission to remove the 29.25-29.3 GHz band from the 2,000 MHz of new ESIM spectrum proposed.

We explained that unlike other potential ESIM spectrum, the 29.25-29.3 GHz band is shared with non-geostationary satellite orbit ("NGSO") systems operating in the mobile satellite service, which raises unique challenges to spectrum sharing not present in other bands identified for ESIMs. As a result of these challenges, coordinating ESIM operations in the band would be a practical impossibility, and would expose NGSO systems like Iridium's to a substantial risk of harmful interference even though they have co-primary rights to the spectrum.

We also explained that any reasonable balancing of risk and reward disfavors authorizing ESIMs in the 29.25-29.3 GHz band. The 50 MHz of spectrum available in the band accounts for just 2.5% of the total amount of new ESIM spectrum proposed by the Commission, and is immaterial to successful ESIM deployment. The risk to large, low-Earth NGSO systems, on the other hand—and to the critical services that only they can provide—would be substantial.

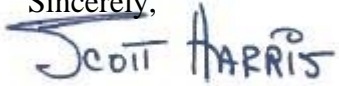
As ESIM proponents themselves have acknowledged, the lack of a verifiable method for defining specific geographic exclusion zones between ESIMs and NGSO systems effectively would require the Commission to conduct or routinely mediate the coordination process – or even worse, mandate a coordination outcome. We explained that this is a role that the Commission has neither the resources nor skills to handle, and that it would be an inappropriate role for the Commission.

Finally, we explained that the Commission's existing rules provide no argument in favor of allowing ESIMs in the 29.25-29.3 GHz band.

Ms. Marlene H. Dortch
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Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "SCOTT HARRIS". The signature is written in a cursive style with capital letters. There is a horizontal line drawn above the word "SCOTT".

Scott Blake Harris
Counsel to Iridium Communications, Inc.

