



SatCom Law LLC
1317 F St. NW, Suite 400
Washington, D.C. 20004
T 202.599.0975
www.satcomlaw.com

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By Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: SES Notice of *Ex Parte* Presentations, GN Docket No. 17-183

Dear Ms. Dortch:

On October 17, 2017, representatives of SES S.A. ("SES") held separate meetings with FCC Chairman Pai and Legal Advisor Rachael Bender; Commissioner Brendan Carr and Acting Legal Advisor Kevin Holmes; Commissioner Michael O'Rielly and Chief of Staff and Legal Advisor Brooke Ericson; and Commissioner Mignon Clyburn and Senior Legal Advisor Louis Peraertz. SES was represented by President and CEO Karim Michel Sabbagh, Chief Strategy and Development Officer Christophe de Hauwer, SES Americom President Gerry Oberst and Vice President, Spectrum Management & Development Americas Kimberly Baum, and the undersigned outside counsel to SES.

The discussion covered a number of points raised by SES and by the Satellite Industry Association in their comments in this docket. SES also noted that it is carefully reviewing the comments filed to date, and the various proposals contained therein.

SES emphasized that it is actively investing in C-band satellite facilities, launching SES-11, a new spacecraft with a C-band payload, just last week. SES stated that its priority is to ensure that it can continue to meet its obligations to its customers, which rely on C-band satellites for critical services, including delivering video and audio programming nationwide to headends that serve cable operators, broadcasters and other multichannel video programming distributors ("MVPDs"). SES observed that because of resistance to rain fade, C-band satellite service has unique reliability advantages that cannot be matched by other satellite spectrum. SES argued that attempting to introduce new terrestrial services on a co-frequency, co-coverage basis would create harmful interference, undercutting the significant benefits derived from highly reliable C-band satellite use.

SES noted that C-band satellites allow small rural cable companies to receive the same diverse programming packages and advanced offerings, such as Ultra High Definition service, that are available to the largest urban MVPDs. In contrast, attempting to shift content carriage to fiber would leave many rural areas stranded, as they are beyond the reach of fiber networks.

SES pointed out that the Commission's earth station database does not accurately reflect the full population of C-band satellite users, as the comments demonstrate that there are thousands

of unregistered receive-only earth stations whose locations are unknown. SES urged the Commission to take action to gather information regarding these earth stations in order to ensure that decisions regarding C-band spectrum are made based on a complete record.

Please address any questions regarding these matters to the undersigned.

Respectfully submitted,

/s/ Karis A. Hastings

Karis A. Hastings
Counsel for SES Americom, Inc.
karis@satcomlaw.com

cc: Meeting participants