



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* Presentation, GN Docket No. 17-183**

Dear Ms. Dortch:

On February 1, 2018, representatives of SES met with staff from the FCC's International Bureau ("IB"), Wireless Telecommunications Bureau ("WTB"), and Office of Engineering and Technology ("OET") to discuss the above-referenced proceeding. The IB representatives were: Jim Schlichting, Jennifer Gilsenan, Robert Nelson, Jose Albuquerque, Christopher Bair, Diane Garfield, Kal Krautkramer, and Michael Mullinix. The OET representatives were: Ronald Repasi, Michael Ha, Nicholas Oros, Brian Butler, and Bahman Badipour. The WTB representatives were: Donald Stockdale, Nese Guendelsberger, Dana Shaffer (participating by telephone), Matthew Pearl, Blaise Scinto, Paul Powell (participating by telephone), Peter Daronco (participating by telephone), and Ariel Diamond. Participants in the meeting on behalf of SES were Christophe De Hauwer, SES Chief Strategy and Development Officer; Yves Bausch, SES Vice President, M&A; Gerry Oberst, President of SES Americom, Inc.; Kimberly Baum, SES Americom Vice President, Spectrum Management & Development Americas; as well as outside counsel to SES Michele Farquhar of Hogan Lovells US LLP and the undersigned. The discussion covered a number of points raised by SES in its comments and reply comments in this docket.

SES noted that throughout this proceeding, it has been focused on ensuring that C-band FSS services that are an indispensable backbone of the country's communications infrastructure are protected and preserved. SES customers depend on C-band FSS for a variety of critical services, including delivery of news, sports, and entertainment video and audio programming and emergency alerts to more than 100 million households nationwide; lifeline communications links to residents of remote areas such as Alaskan bush villages; offerings by government agencies, both civilian and military, that are vital to public safety, including the distribution of weather data, support for missile warning systems, and communications capacity for Naval vessels; and restoration of services following an emergency, such as the devastating 2017 hurricanes. To be viable, any proposal for expanded terrestrial use of C-band spectrum must allow these essential satellite services to continue to be provided with near-perfect reliability.

Having studied various options in detail, including past FCC precedent and proposals filed by various parties in the proceeding, SES has been evaluating a secondary market approach for the C-band. SES has concluded that simple sharing proposals in conjunction with various

auction frameworks would not be feasible or effective for a variety of reasons. Given the large number of earth stations using the band for vital services and the substantial separation distances required to protect those services, attempting to implement co-frequency sharing would create a lose-lose situation for the satellite community and incoming terrestrial providers. Conventional band clearing is not a viable option because it would disrupt essential satellite services, and in any event, the timeline for clearing and auctions is typically quite lengthy, stretching to a decade or more. Moreover, an auction approach could run afoul of the ORBIT Act's prohibition against auctioning spectrum used for international or global satellite services.

SES is currently assessing how a market-based solution might work in the C-band, and the various elements that would need to be addressed by private parties and by the FCC to ensure adequate protection for satellite services. SES reiterated that to be viable, any approach would need to compensate and incentivize incumbents given their substantial investment in C-band satellite networks and the complexity and importance of existing operations.

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](mailto:karis@satcomlaw.com)

cc: Jose Albuquerque  
Jim Schlichting  
Christopher Bair  
Robert Nelson  
Jennifer Gilsenan  
Diane Garfield  
Kal Krautkramer  
Michael Mullinix  
Ronald Repasi  
Brian Butler  
Nicholas Oros  
Michael Ha  
Bahman Badipour  
Donald Stockdale  
Dana Shaffer  
Nese Guendelsberger  
Blaise Scinto  
Matthew Pearl  
Paul Powell  
Peter Daronco