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October 21, 2019

VIA ELECTRONIC FILING

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

Re: AT&T Services, Inc. Notice of *Ex Parte* Presentation
Mitigation of Orbital Debris in the New Space Age, IB Docket No. 18-313

Dear Ms. Dortch,

Pursuant to Section 1.1206 of the Federal Communications Commission's rules, this letter provides notice that on October 17, 2019, representatives of AT&T Services, Inc. ("AT&T") met with staff of the International Bureau's Satellite Division ("Bureau") to discuss the above-captioned rulemaking proceeding. Participating on behalf of AT&T were Jessica Lyons (by phone), Raquel Noriega, and Navid Motamed (by phone), as well as Jennifer Hindin and Daniel Brooks of Wiley Rein LLP as outside counsel. Participating on behalf of the Bureau were Jose Albuquerque, Karl Kensinger (by phone), Stephen Duall, Merissa Velez, and Samuel Karty.

During the meeting, the participants discussed the Commission's proposal to require GSO operators seeking license term extensions to certify that a satellite has no single point of failure or other malfunctions. The NPRM proposes to require satellite operators to file such certifications when submitting applications for a license term extension and notes that, were an operator unable to make such certification, it could submit additional information in the form of a narrative to justify why a license term extension is warranted despite the existence of a single point of failure or other malfunction.¹ As such, the Commission inherently understands that a certification alone is not the only means by which to assess a satellite license term extension.

AT&T agrees and, as explained in our pleadings in this proceeding, urges the Commission to reconsider this proposal. Rather than requiring license term extension applicants to file a binary yes/no certification offering limited and potentially misleading information, a better approach is to codify the Commission's current practice of requesting this information

¹ See *Mitigation of Orbital Debris in the New Space Age*, Notice of Proposed Rulemaking and Order on Reconsideration, 33 FCC Rcd 11352, ¶ 65 (2018).

from GSO licensees seeking license term extensions. Imposing a strict certification requirement would ignore the overall reliability of a satellite and would also raise confidentiality issues. As AT&T explained in its comments and reply comments filed in this proceeding, the existence of a single point of failure does not necessarily mean that a satellite will fail either while in orbit or in the process of deorbiting, or even that there is a reasonable probability of such failure. Moreover, the Commission's current practice is to allow parties to submit this information on a confidential basis, and that practice should continue to apply. Because a licensee's inability to make any of the proposed certifications in a license renewal application would necessarily become public, the Commission should instead continue to allow parties to submit this information in narrative format rather than impose a mandatory certification requirement.

The parties also discussed the timing and status of this proceeding as well as AT&T's additional views expressed in its comments and reply comments regarding the Commission's proposals to place a five-year limit on the duration of license term extensions; impose indemnification requirements on satellite operators; and require encryption of telemetry, tracking, and command communications.

Please contact the undersigned with any questions regarding this submission.

Sincerely,

/s/ Jessica B. Lyons

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