



February 14, 2018

**BY ELECTRONIC FILING**

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

**Re: SES and O3b Notice of *Ex Parte* Presentation, 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 February 13, 2018, representatives of SES Americom, Inc. and its affiliate, O3b Limited, (the "Company") met with members of the International Bureau to discuss the above referenced proceeding. The International Bureau participants were Jose Albuquerque, Paul Blais (by phone), Stephen Duall, Jennifer Gilsenan, and Cindy Spiers. The Company representatives were Kim Baum, VP, Spectrum Management & Development Americas (by phone); Petra Vorwig, Senior Legal and Regulatory Counsel; Will Lewis, Regulatory Counsel; Noah Cherry, Legal Counsel Maritime and International Regulatory; and Karis Hastings, outside counsel to the Company.

The attached document was circulated at the meeting and formed the basis for the discussion.

Please address any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Petra A. Vorwig

Senior Legal and Regulatory Counsel

SES Americom, Inc.

1129 20<sup>th</sup> Street, NW

Suite 1000

Washington, DC 20036

(202) 478-7143

Attachment

cc: Jose Albuquerque  
Paul Blais  
Stephen Duall  
Jennifer Gilsenan  
Cindy Spiers

**Earth Stations in Motion NPRM**  
**Satellite Division Meeting**  
**February 13, 2018**

- SES, as an operator of over 50 geostationary satellites, and its subsidiary O3b Limited, as an operator of a constellation of 12 nongeostationary satellites, provide service to a number of earth station in motion operators in the aeronautical and maritime industries. The company supports many of the proposals the Commission outlined in its notice of proposed rulemaking, but have noted in its comments that even more can be done to encourage ESIM services in the United States. Most importantly, the Commission should develop ESIM rules for NGSO networks and allow ESIM operations in additional Ku- and Ka-band segments that either would not have any effect on other operations or could be designed to protect incumbent operations.
- As an initial matter, now that the NGSO Ka-band order is effective, the Commission should propose rules for NGSO ESIM operations as soon as possible, through a further NPRM if needed. As SES has previously noted, timing is critical because multi-band, multi-orbit terminals are already being developed.
- The rules should allow ESIM operators to designate operations with specific satellites in the Appendix 30B extended Ku-band spectrum (10.7-10.95 GHz and 11.2-11.45 GHz).
- The Commission should authorize ESIM operations on a secondary basis in the 17.8-18.3 GHz downlink spectrum consistent with the rule changes made in the NGSO Report and Order.
- The Commission should allow use of the NGSO MSS bands for ESIM operations as proposed in the NPRM following the definition of reasonable coordination zones around Iridium's US gateway earth stations within which coordination would be required prior to ESIM operations.