

February 28, 2018

VIA ELECTRONIC DELIVERY

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

Re: Notice of Ex Parte Presentation in IB Docket No. 16-408

Dear Ms. Dortch:

On February 26, 2018, representatives of WorldVu Satellites Limited (d/b/a OneWeb) met separately with Commissioners Jessica Rosenworcel and Michael O’Rielly and their respective legal advisors.¹

During these discussions, OneWeb emphasized that the following considerations are critical to the successful development of NGSO FSS systems:

- Band segmentation should not guide spectrum sharing in the United States when coordination in good faith is not achievable.²
- The orbital environment is extremely fragile and even a single collision can have serious and long-lasting consequences.³ Regulators should encourage responsible and reliable satellite design and operation from launch to disposal.

OneWeb otherwise reiterated its positions of record in this proceeding. Please do not hesitate to contact the undersigned with any questions.

¹ See Annex 1 for a list of participants.

² See Petition for Reconsideration of WorldVu Satellites Limited, IB Docket No. 16-408 (filed Jan. 17, 2018).

³ See e.g., University of Southampton, *Biggest ever space debris study highlights risks posed by satellite ‘mega-constellations’* (Apr. 19, 2017), available at <https://www.southampton.ac.uk/news/2017/04/space-debris-mega-constellations.page>.

SheppardMullin

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Very truly yours,

/s/ Brian D. Weimer

Brian D. Weimer
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Attachment

Annex 1

Meeting Date	OneWeb Representatives	FCC Participants
February 26, 2018	Greg Wyler, Founder & Executive Chairman Tony Azzarelli, VP International Regulatory and Policy Affairs Gabriela Lago, Senior Manager, Regulatory Market Access	Commissioner Jessica Rosenworcel Umair Javed, Legal Advisor
February 26, 2018	Greg Wyler, Founder & Executive Chairman Gabriela Lago, Senior Manager, Regulatory Market Access	Commissioner Michael O’Rielly Erin McGrath, Legal Advisor