

March 2, 2018

VIA ELECTRONIC FILING

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; GN Docket No. 17-183;
GN Docket No. 14-177**

Dear Ms. Dortch:

On February 28, 2018, Tony Azzarelli, VP of International Regulatory and Government Affairs, and Gabriela Lago, Senior Manager, Regulatory Market Access of WorldVu Satellites Limited (d/b/a OneWeb) met with Tom Sullivan, Chief of the Commission's International Bureau. Also present at the meeting were David Goldman, Chief Counsel, Communications and Technology at the House Committee on Energy and Commerce, as well as Brett Tarnutzer, Head of Spectrum and Veena Rawat, Senior Spectrum Advisor for the Groupe Spéciale Mobile Association.

During this meeting, OneWeb representatives 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.¹ Forcing NGSO FSS systems to operate in a fragmented spectrum sharing regime—with one framework for global operations and one for the U.S.—could lead to inefficient and anticompetitive outcomes.
- Utilization of the 12.2-12.7 GHz band on a protected basis is essential for OneWeb to make its mission—to bridge the digital divide and bring affordable access to everyone—a reality. As the Commission considers additional bands for 5G services, it should not initiate a rulemaking to allow terrestrial broadband use of this critical NGSO spectrum.

¹ See Petition for Reconsideration of WorldVu Satellites Limited, IB Docket No. 16-408 (filed Jan. 17, 2018).

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- Satellite operators remain willing to work with terrestrial providers to ensure flexible and efficient use of the 28 GHz band. The Commission's current regulations in this band may create earth station siting challenges.²

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

Very truly yours,

/s/ Brian D. Weimer

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

cc: Tom Sullivan, International Bureau

² See 47 C.F.R. § 25.136.