



SatCom Law LLC  
1317 F St. NW, Suite 400  
Washington, D.C. 20004  
T 202.599.0975  
www.satcomlaw.com

October 30, 2017

***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 October 26, 2017, Gerry Oberst, President of SES Americom, Inc., and the undersigned outside counsel to SES met to discuss the above-referenced proceeding with Erin McGrath, Legal Advisor to Commissioner O’Rielly. The discussion covered a number of points raised by SES and by the Satellite Industry Association in their comments in this docket. SES also noted that it is carefully reviewing the comments filed to date and the various proposals contained therein.

SES stated that its priority is to ensure that it can continue to meet its obligations to its customers, which rely on C-band satellites for critical services, including delivering video and audio programming nationwide to headends that serve cable operators, broadcasters and others. SES observed that attempting to shift content carriage to fiber would leave many rural areas stranded, as they are beyond the reach of fiber networks.

SES pointed out that the Commission’s earth station database does not accurately reflect the full population of C-band satellite users, as the comments demonstrate that there are thousands of unregistered receive-only earth stations whose locations are unknown. SES urged the Commission to take action to gather information regarding these earth stations in order to ensure that decisions regarding C-band spectrum are made based on a complete record.

SES also emphasized that the record includes inaccuracies regarding the extent to which other countries are pursuing the 3.7-4.2 GHz band for terrestrial mobile services. Specifically, SES noted that only a handful of administrations globally are considering making any spectrum in this range available for mobile services, and those few mainly are focused on only the lowest portion of the band, below 3.8 GHz.

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: Erin McGrath