

April 13, 2018

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Ex Parte

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

Re: 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 April 12, 2018, representatives of SES Americom, Inc., Inmarsat and Viasat met with Rachael Bender, advisor to Chairman Pai. The following company representatives participated in the meeting: Petra Vorwig, Senior Legal and Regulatory Counsel, and Philippe Secher, Senior Manager, Spectrum Management & Development Americas for SES Americom, Inc., Giselle Creaser, Director Regulatory, for Inmarsat, and Elizabeth Park of Latham & Watkins LLP for Viasat.

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

Respectfully submitted,

/s/ Petra A. Vorwig

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**Meeting with Rachael Bender
April 12, 2018**

ESIM Operations in the 29.25-29.3 GHz Band

- The record in this proceeding demonstrates how earth stations in motion (ESIM) can operate across the United States without causing unacceptable interference to Iridium's feeder link operations in the same portion of the Ka-band.
- SES, Inmarsat and Viasat propose the Commission adopt a policy statement that will acknowledge the Commission's ability to authorize ESIM operations across the United States in spectrum currently utilized by Iridium where an ESIM applicant demonstrates that its operations will not have a significant impact on Iridium's licensed and actual feeder link operations.
- The policy would appropriately balance Iridium's concerns against the Commission's responsibility to ensure spectrum is put to full use for the benefit of Americans.

ESIM Operations in the 28.35-28.6 GHz Band

- ESIM operations in the 28.35-28.6 GHz band will not cause unacceptable interference to UMFUS operations in the 27.5-28.35 GHz band, as the Global Mobile Suppliers Association (GSA) suggests.
- As each of the FSS Operators have argued, ESIM operations are subject to the same out of band emissions limits as fixed earth stations under Section 25.202(f), which were established to ensure that transmitting earth stations will not cause unacceptable interference to operations in neighboring frequencies.
- Viasat has submitted analysis that demonstrates that the GSA's fears are unfounded, and ESIM operations in the 28.35-28.6 GHz band should not be limited, which SES and Inmarsat support.