



April 23, 2018

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**VIA ELECTRONIC FILING**

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

Re: *Intelsat and SES Notice of Ex Parte Presentation*  
GN Docket Nos. 17-183, 18-122

Dear Ms. Dortch:

Per FCC Rule 1.1206, this letter provides notice that on April 19, 2018, the representatives of Intelsat Corporation ("Intelsat") and SES Americom, Inc. ("SES") listed in Attachment A (the "Parties") met with representatives from the Commission listed in Attachment B.

The joint, market-based proposal of Intelsat, SES and Intel will make spectrum in the 3.7-4.2 GHz band available for mobile broadband use while protecting critical Fixed Satellite Service ("FSS") operations. In the meeting, the Parties explained their detailed and ongoing analysis of the multiple complex steps that would be needed to effectuate this proposal, resulting in their proposed clearing target and time frame. They specifically described the range of tools needed and the difficulties inherent in making the required changes while maintaining services for their customers, and the technical challenges of optimizing compatibility between 5G transmissions and the remaining FSS operations in the band.

The Parties discussed and distributed the attached "C-Band / 5G Coexistence" presentation, which overviews the detailed and comprehensive empirical study Intelsat and SES are conducting to assess the impact of 5G operations on continued 3.7-4.2 GHz FSS operations in the band. The Parties described C-band operations today and the challenges of preventing 5G transmissions from saturating the low noise block of C-band earth station transponders, highlighting that their goals are to preserve 5G's in-band power flexibility and reduce operational constraints while protecting FSS operations in the remaining band. They added that they are working with mobile equipment manufacturers to address the technical trade-offs and optimize any compatibility requirements.



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In addition, Intelsat and SES each separately presented confidential and competitively-sensitive information (without the presence of the other company) demonstrating the intricate methods and tools each company will utilize to groom existing customers out of spectrum coordinated for mobile use. Intelsat and SES each explained that not all C-band satellites are fungible and that their satellites used to distribute video programming are already very heavily utilized.

Specifically, SES presented a report on (a) its North America C-band satellite loading per application, (b) its historic, current, and forecasted demand for North America video C-band, and (c) the SES internal plan to make 100 MHz (plus the necessary transition band) available for mobile use. In this context, SES addressed the complicated tools that it would utilize to implement the proposal, including regrooming traffic, adding additional satellites, upgrading satellite reception through filters and mitigation techniques, and possibly relocating or fiberizing a few cable headends.

Likewise, Intelsat presented a snapshot of the current loading of its cable arc satellites and explained how that loading could be adjusted to clear the relevant number of transponders in an 18-36 month time period, while still maintaining the high quality of service to existing video distribution customers. Intelsat discussed use of the same tools described above, including some that could be used to clear more spectrum but would be substantially costlier and require more time.

The presentations reinforced that the 100 MHz near-term clearing target for terrestrial mobile use is what each operator can accomplish reasonably within 18-36 months following a final Commission order, while ensuring the continued availability of highly reliable service to existing video customers. The ability to clear additional spectrum in the future beyond that amount, while still maintaining high quality video distribution and other services to customers, would be substantially more expensive and time consuming, but could be achieved if market conditions are sufficiently favorable.

Please contact the undersigned with any questions regarding this letter.



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Respectfully submitted,

A handwritten signature in black ink, appearing to read "H. Gola".

Henry Gola  
Wiley Rein LLP

*Counsel to Intelsat Corporation*

Attachment

cc: Don Stockdale  
Thomas Sullivan  
Julius Knapp



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**ATTACHMENT A**

Bruno Fromont, Senior Vice President, Strategy & Asset Management, Intelsat

Susan Crandall, Associate General Counsel, Intelsat

Hazem Moakkit, Vice President, Spectrum Strategy, Intelsat

Alexander Gerdenitsch, Manager, Spectrum Policy, Americas, Intelsat

Christophe De Hauwer, Chief Strategy & Development Officer, SES S.A.

Gerry Oberst, President, SES Americom, Inc.

Kimberly Baum, Vice President, Spectrum Management & Development Americas, SES Americom, Inc.

Yves Bausch, Vice President, Strategic Portfolio Development, SES S.A.

Jennifer Hindin, Wiley Rein LLP, counsel for Intelsat

Henry Gola, Wiley Rein LLP, counsel for Intelsat

Michele Farquhar, Hogan Lovells US LLP, counsel for SES Americom, Inc.



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## **ATTACHMENT B**

### **Wireless Telecommunications Bureau**

Don Stockdale

Matthew Pearl

Becky Schwartz

Jeff Tignor

Ariel Diamond

Barbara Pavon

Peter Daronco (via phone)

Dana Shaffer (via phone)

### **International Bureau**

Thomas Sullivan

Jose Albuquerque

Christopher Bair

Paul Blais

Kal Krautkramer

### **Office of Engineering and Technology**

Julius Knapp

Michael Ha

Bahman Badipour

Nick Oros