

Brian D. Weimer
202.747.1930 direct
bweimer@sheppardmullin.com

May 14, 2019

VIA IBFS & ECFS

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

Re: **Notice of Ex Parte Presentation**
WorldVu Satellites Limited, Application for Modification, IBFS File No. SAT-
MOD-20180319-00022
Space Exploration Holdings, LLC, Request for Modification of the Authorization
for the SpaceX NGSO Satellite System, IBFS File No. SAT-MOD-20181108-00083
Mitigation of Orbital Debris in the New Space Age, et al., Notice of Proposed
Rulemaking and Order on Reconsideration, IB Dkt. No. 18-313

Dear Ms. Dortch:

On May 10, 2019, the undersigned, outside counsel to WorldVu Satellites Limited (“OneWeb”), OneWeb Chief Executive Officer Adrian Steckel, Vice President of Regulatory Affairs Ruth Pritchard-Kelly, and General Counsel Steve Chernow met with Chairman Ajit Pai and his Acting Wireless and International Advisor, Aaron Goldberger.

OneWeb presented a general update on the successful launch of OneWeb’s first batch of production satellites and detailed the continuing deployment of OneWeb’s business operations both in the United States and around the globe. OneWeb reiterated its fundamental commitment to the mission it has been pursuing from inception: to bridge the digital divide and bring the benefits of broadband internet access to new markets around the world.¹

OneWeb also urged the Commission to grant the pending OneWeb Modification Application as expeditiously as possible.² Given the recent grant of the SpaceX Modification Application,

¹ OneWeb also showed a short video highlighting its commitment to bridging the digital divide. OneWeb, <https://vimeo.com/burningreel/review/319789157/fe9dd77577>.

² See WorldVu Satellites Limited, Application for Modification, IBFS File No. SAT-MOD-20180319-00022 (filed Mar. 19, 2018) (“OneWeb Modification Application”).

OneWeb asked the Commission to apply its review process in a manner that provides fair and equal treatment to processing round participants.³

OneWeb noted that the SpaceX Modification Application, which proposed significant changes to both constellation architecture and frequency utilization, was granted less than six months after filing. By comparison, the OneWeb Modification Application, which proposed only one change (an increase in the number of authorized satellites), has been pending at the Commission for almost fourteen months. OneWeb also discussed how the OneWeb Modification Application was only prompted by a relaxation of the Commission's NGSO milestone rule, the previous version of which OneWeb had assiduously adhered to in planning and submitting its initial request for U.S. market access.⁴

Finally, in response to questions from the Chairman, OneWeb reiterated its positions of record in the Commission's pending orbital debris proceeding.⁵

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: Chairman Ajit Pai
Aaron Goldberger

³ See *Space Exploration Holdings, LLC, Request for Modification of the Authorization for the SpaceX NGSO Satellite System*, Order and Authorization, IBFS File No. SAT-MOD-20181108-00083, DA 19-342 (IB rel. Apr. 26, 2019); *Space Exploration Holdings, LLC, Request for Modification of the Authorization for the SpaceX NGSO Satellite System*, IBFS File No. SAT-MOD-20181108-00083 (filed Nov. 8, 2018) ("SpaceX Modification Application").

⁴ See *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 7809, 7830 ¶ 66 (2017).

⁵ See *Mitigation of Orbital Debris in the New Space Age, et al.*, Notice of Proposed Rulemaking and Order on Reconsideration, IB Dkt. No. 18-313, FCC 18-159 (rel. Nov. 19, 2018); Comments of WorldVu Satellites Limited, IB Dkt. No. 18-313 (filed Apr. 5, 2019); Reply Comments of WorldVu Satellites Limited, IB Dkt. No. 18-313 (filed May 6, 2019).