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June 13, 2018

VIA ECFS

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

Dear Ms. Dortch:

On June 11, 2018, the undersigned outside counsel to WorldVu Satellites Limited (“OneWeb”) and David Carmen of The Carmen Group, advisor to OneWeb, met with Commissioner Michael O’Rielly and Erin McGrath, legal advisor to Commissioner O’Rielly and, separately, with Will Adams, legal advisor to Commissioner Brendan Carr. On June 12, 2018, the undersigned also met again with Will Adams.

These meetings focused on OneWeb’s petition for reconsideration of the band-splitting rule adopted in the Commission’s Report and Order in the above-captioned proceeding.¹ As detailed in its Petition for Reconsideration, OneWeb pointed out that instead of constituting a default band-splitting trigger, the Commission should utilize the $\Delta T/T$ of 6 percent threshold as a *coordination* trigger; *i.e.*, once $\Delta T/T$ of 6 percent has been achieved, then the Commission should fall back on ITU filing date priority as the overarching rule to determine how two NGSO FSS systems can be protected.

OneWeb also pointed out the flaws contained in a recent filing by Viasat, Inc. (“Viasat”) addressing the $\Delta T/T$ of 6 percent threshold.² In particular, OneWeb highlighted its recent joint

¹ See Petition for Reconsideration of WorldVu Satellites Limited, IB Docket No. 16-408 (filed Jan. 17, 2018); *see also* Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed Satellite Service Systems and Related Matters, Report & Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 7809, 7825-26 ¶¶ 48-50 (2017).

² See Letter from John P. Janka, Counsel to Viasat, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 16-408 (May 14, 2018).

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submission with Telesat Canada addressing this issue and emphasized the $\Delta T/T$ of 6 percent threshold is unworkable in real time and contributes to unnecessary spectrum uncertainty for NGSO FSS systems.³

OneWeb otherwise reiterated its positions of record in this proceeding. 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: Commissioner Michael O’Rielly
Erin McGrath, legal advisor to Commissioner O’Rielly

Will Adams, legal advisor to Commissioner Carr

³ See Letter from Henry Goldberg, Counsel to Telesat Canada, and Brian Weimer, Counsel to OneWeb, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 16-408 (June 1, 2018).