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June 27, 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 26, 2018, the undersigned, outside counsel to WorldVu Satellites Limited (“OneWeb”) and David Carmen of The Carmen Group, advisor to OneWeb, met with Rachael Bender, legal advisor to Chairman Ajit Pai.

The meeting 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 OneWeb’s Petition for Reconsideration, the Commission’s current band-splitting rule is unworkable and creates unnecessary spectrum uncertainty for NGSO FSS systems.² OneWeb emphasized the necessity of a reasonable and workable sharing regime to help facilitate the success of NGSO FSS systems. OneWeb remains committed to working with Commission staff to develop an appropriate solution to this vital issue.

OneWeb otherwise reiterated its positions of record in this proceeding. Please do not hesitate to contact the undersigned with any questions.

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 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); 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 20, 2018).



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Very truly yours,

/s/ Douglas A. Svor

Douglas A. Svor
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Rachael Bender, legal advisor to Chairman Ajit Pai