

July 8, 2016

VIA ELECTRONIC FILING

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

Re: Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, GN Docket No. 14-177; IB Docket Nos. 15-256, 97-95; RM-11664; and WT Docket No. 10-112.

Dear Ms. Dortch:

On July 7, 2016, Maureen C. McLaughlin of Iridium Communications, Inc. and I, met – and had a brief phone call -- with Erin McGrath, Legal Advisor to Commissioner O’Rielly.

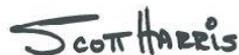
During the meeting and follow-up call, we discussed Iridium’s provision of global, reliable, and low-latency communications that support the mission-critical activities of vital industrial sectors, first responders, and the U.S. government. We also discussed Iridium NEXT, Iridium’s next-generation platform that will be capable of delivering a variety of innovative commercial, defense, and public safety services on ships, planes, and in remote earth locations.

We explained that the critical services that Iridium provides today, and will deliver using Iridium NEXT, depend on co-primary feeder uplink and telemetry, track & control (“TT&C”) operations in the 29.1-29.25 GHz band.

We expressed support for the Commission’s determination¹ that the bandwidth available in the 29.1-29.25 GHz band simply does not meet the requirements for terrestrial 5G networks, and urged the Commission to continue to focus on more viable spectrum for flexible use services.

Finally, we emphasized that the unique architecture of Iridium’s low-earth, non-geostationary orbit satellite network poses exceptional challenges to sharing this spectrum with ubiquitously deployed terrestrial services.

Sincerely,



Scott Blake Harris
Counsel for Iridium Communications, Inc.

Cc: Erin McGrath

¹ See *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services*, G.N. Docket No. 14-177, et al., Notice of Proposed Rulemaking, FCC 15-138, 30 FCC Rcd. 11,878 ¶¶ 20, 70 (rel. Oct. 23, 2015).