

July 10, 2019

FILED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: IB Docket No. 18-314, *Further Streamlining Part 25 Rules Governing Satellite Services*
IB Docket No. 18-315, *Facilitating the Communications of Earth Stations in Motion with*
Non-Geostationary Orbit Space Stations
Ex Parte Communication

Dear Ms. Dortch:

On July 9, 2019, Kymeta Corporation (“Kymeta”), represented by Ryan Stevenson, Vice President and Chief Scientist; Richard Hadsall, Vice President, Global Network Operations; and the undersigned, regulatory counsel to Kymeta, met with representatives of the Satellite Division (“SD”) of the International Bureau to discuss several issues in the above-referenced dockets. SD was represented by Jose Albuquerque, Chief; Kerry Murray, Deputy Chief; Paul Blais, Chief, Systems Analysis Branch; Stephen Duall, Chief, Policy Branch; and Cindy Spiers, Policy Branch.

Kymeta’s advocacy was consistent with its Comments in IB Docket No. 18-315 and its Reply Comments in IB Docket No. 18-314.

Kymeta strongly supported the blanket licensing of earth stations in motion (“ESIMs”) operating with non-geostationary satellite orbit (“NGSO”) fixed-satellite service (“FSS”) systems. Such blanket licensing is essential to the rapid deployment of ESIMs as NGSO systems come online.

Kymeta urged the FCC to allow licensees already holding blanket authority for ESIMs to communicate with geo-stationary orbit (“GSO”) satellites to file a streamlined modification application to add blanket authority to communicate with NGSOs in the same band(s). Kymeta noted that the FCC will already have reviewed and approved all the requisite technical showings, including compliance with radiation frequency safety standards and network control and monitoring requirements. Kymeta also noted that the 2-degree showing is only relevant to ESIMs communicating with GSOs, and that, in any event, a licensee holding blanket authority for ESIMs to communicate with GSO satellites will already have demonstrated compliance with the 2-degree requirements. Finally, Kymeta noted that compliance with the equivalent power

flux density (“EPFD”) requirement in Section 25.289 applies to satellite operators, not earth station operators.

Kymeta recommended that applications for modification of blanket authority to add NGSO satellites as points of communication be subject to the standard 30-day Public Notice period. If no objections are filed, Kymeta proposed that the application be deemed granted 14 days after expiration of the Public Notice period.

Kymeta expressed its support for the option of a unified space station/earth station license. Kymeta asked the Commission to clarify that the unified licensing option be available to both fixed stations and ESIMs. Kymeta urged the Commission to make the unified license available to earth stations communicating with NGSO satellites. Kymeta noted that unified licensing will streamline and accelerate the introduction of new earth stations, and that satellite operators already require earth station operators to undergo rigorous certification testing.

Finally, Kymeta expressed its support for Intelsat’s proposal to permit minor earth station modifications, without notification, not just for “electrically identical” equipment, but also for equipment operating within emission and other technical limits in a license or blanket authorization.

Please do not hesitate to contact the undersigned if you have any questions.

Respectfully submitted

KYMETA CORPORATION

/s/ Robert S. Koppel

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