

LATHAM & WATKINS^{LLP}

July 18, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ligado Networks LLC, Notice of *Ex Parte* Presentation
IB Docket Nos. 11-109 & 12-340; IBFS File Nos. SES-MOD-20151231-
00981, SAT-MOD-20151231-00090, SAT-MOD-20151231-00091

Dear Ms. Dortch:

On Thursday, July 14, 2016, Valerie Green, Executive Vice President and Chief Legal Officer, Ligado Networks LLC (“Ligado”); Maqbool Aliani, Vice President of Spectrum Strategy and Technology Development, Ligado; Sachin Chhibber, Director, Radio Access Network, Ligado; Gerard Waldron, Covington & Burling; and the undersigned, met with the International Bureau representatives listed below to discuss Iridium Communications, Inc.’s filings in this proceeding.

The discussion focused on the following points:

- No Iridium objection exists to Ligado’s use of its upper 10 MHz channel at 1646.5-1656.5 MHz.
 - Iridium’s concern is just with Ligado’s lower 10 MHz uplink channel at 1627.5-1637.5 MHz.
- No technical analysis has been provided to substantiate Iridium’s claims.
- No clear “ask” exists from Iridium regarding a solution.
- The same link budget margin that Iridium must employ to avoid overload also would provide more than enough margin with respect to out-of-band emissions.

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- Iridium's own technical analysis shows significant degradation in the presence of Globalstar uplinks (*See* Supplemental Comments of Iridium Constellation LLC, RM-11697, IB Docket No. 13-213, at Ex. 2, Table 1: Globalstar Terminal Interference to Iridium Satellite and User Terminals (filed Nov. 5, 2014)).
- Millions of authorized MSS uplinks could be operating in neighboring bands at far higher OOB and in-band power levels than Ligado's 0.2 watt terminals.
 - Iridium's proposed exclusion zones would not constrain the operation of those other MSS uplink transmitters.
- Ligado remains committed to seeking a mutually agreeable solution with Iridium.

Please contact me if you have any questions.

Respectfully submitted,

/s/

John P. Janka

cc: Jose Albuquerque
Karl Kensinger (participated by phone)
Kerry Murray (participated by phone)
Chip Fleming
Kal Krautkramer
Sankar Persaud
Clay DeCell
Jay Whaley