



August 25, 2017

**BY ELECTRONIC FILING**

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

**Re: *Implementing Earth Station Siting Methodologies, IB Docket 17-172***

Dear Ms. Dortch:

On August 24, 2017, Hughes Network Systems, LLC (“Hughes”) and Inmarsat, Inc. (“Inmarsat”) met with members of the International Bureau (“IB”), by phone, to discuss various filings in the above-referenced proceeding. Hughes was represented by Jennifer A. Manner, Senior Vice President, Regulatory Affairs and Inmarsat was represented by Giselle Creeser, Director, Regulatory. Representatives of IB included Jose Albuquerque, Paul Blais, Alyssa Roberts, and Chip Fleming.

In the meeting, Hughes discussed its individually filed comments, and Inmarsat and Hughes discussed the comments and reply comments that were jointly filed in this docket by a group of satellite operators, including Inmarsat; SES Americom, Inc.; O3b Networks, Ltd.; WorldVu Satellites, Ltd. d/b/a OneWeb (on reply); Telesat, and Hughes (on reply).<sup>1</sup> The discussions focused on the satellite industry’s preference for guidelines that would address the analyses required under Section 25.136. Several outstanding issues, including colocation of earth stations and the use of the antenna patterns contained in Section 25.209 of the Commission’s rules in earth station license applications were addressed. Both parties also addressed how several comments in the docket contained items that were not under the scope of the above-referenced Public Notice, and would have been more appropriate for reconsideration in the Spectrum Frontiers proceeding;<sup>2</sup> and should be dismissed as late filed petitions for reconsideration, including, for example, changes to the 0.1% population coverage limitation apportionment.

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<sup>1</sup> Comments of SES Americom, Inc., O3b Limited, Inmarsat, Inc. and Telesat, IB Docket No. 17-172, at 5-6, (filed July 21, 2017); Reply Comments of SES Americom, Inc.; O3b Limited; Hughes Network Systems, LLC; Inmarsat, Inc.; WorldVu Satellite Ltd. d/b/a OneWeb; and Telesat (filed Aug. 17, 2017).

<sup>2</sup> *Use of Spectrum Bands above 24 GHz for Mobile Radio Services* (GN Docket 14-177) and *Establishing a More Flexible Framework to Facilitate Satellite Operations in the 27.5-28.35 GHz and 37.5-10 GHz Bands* (IB Docket 15-256) (petitions for reconsideration due December 14, 2016).

Pursuant to the Commission's rules, this notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

*/s/ Jennifer A. Manner*

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*/s/ Giselle Creeser*

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cc: Jose Albuquerque  
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