

September 1, 2016

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

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

Dear Ms. Dortch:

Attached please find a Technical Study prepared by Iridium Communications Inc. (“Iridium”) detailing the significant risk of harmful interference that would be created by granting Ligado the flexibility to deploy user terminals for a CMRS system in the 1627.5-1637.5 MHz band.¹ As detailed in the study, Ligado’s proposed deployment would generate out of band emissions (“OOBE”) significantly higher than Iridium’s current system and recently approved Iridium NEXT system can tolerate – particularly from a Ligado system that could well be densely and ubiquitously deployed.

As envisioned when Iridium’s first-of-its-kind mobile satellite system (“MSS”) was launched in 1998, Iridium has built a large and growing satellite business that now serves over 800,000 subscribers – many of them federal government users. Iridium has also invested heavily in the system, with the \$3 billion Iridium NEXT system on the cusp of launch. All of this has been efficiently achieved on the 8.725 MHz of spectrum currently licensed to Iridium.

In assessing these issues, the Commission should recall the original purpose and goal of granting MSS providers Ancillary Terrestrial Component (“ATC”) status. That goal was to maximize flexibility consistent with sound spectrum management and protection of incumbent MSS, and the Commission therefore included “several conditions designed in part to ensure the

¹ See *Comment Sought on Ligado’s Modification Applications*, Public Notice, IB Docket No. 11-109, IB Docket No. 12-340, DA 16-442 (rel. Apr. 22, 2016).

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allocation remains first and foremost a satellite service.”² The well-reasoned policy was clearly articulated through the inclusion of Section 25.255 of the Commission’s rules, which squarely places the responsibility on the ATC provider to cure any interference to adjacent MSS operators.³ And this policy makes sense, as the ATC provider is seeking a deviation from the original allocation (from satellite to terrestrial) and reaping the corresponding financial windfall.

To be clear, Iridium takes no position on the ultimate disposition of the other 30 MHz of nationwide spectrum that Ligado seeks to parlay into a nationwide CMRS network. Iridium’s only concern is to protect Iridium’s frequencies from harmful interference to its vibrant MSS service in the face of Ligado’s efforts to convert the 1627.5-1637.5 band to CMRS. While the attached study details that threat, Iridium remains open to continued dialogue with Ligado to find a resolution to these issues that will allow both parties to move forward.

Please direct any questions concerning this submission to the undersigned.

Respectfully submitted,

/s/ Bryan N. Tramont
Bryan N. Tramont

cc: Charles Mathias
Paul Murray
Ron Repasi
Brian Regan
Jennifer Tatel

² See *Flexibility for Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band, the L-Band, and the 1.6/2.4 GHz Bands*, Report and Order and Notice of Proposed Rulemaking, 18 FCC Rcd 1962, 1979-80 ¶ 31 (2003) (stating that “we do not permit MSS licensees to provide any type of service that the allocation permits, but rather permit the incumbents to deploy MSS ATC subject to several conditions designed in part to ensure the allocation remains first and foremost a satellite service.”).

³ 47 C.F.R. § 25.255 (“If harmful interference is caused to other services by ancillary MSS ATC operations, either from ATC base stations or mobile terminals, the MSS ATC operator must resolve any such interference”).