



September 7, 2017

VIA ECFS

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

Re: Notice of Ex Parte Presentation in IB Docket No. 16-408

Dear Ms. Dortch:

On September 5, 2017, David Carmen of The Carmen Group, on behalf of WorldVu Satellites Limited ("OneWeb"), spoke over the phone with Rachael Bender, Wireless and International Advisor to Chairman Ajit Pai.

The purpose of this call was to discuss issues related to the pending notice of proposed rulemaking in the above-captioned proceeding. Specifically, OneWeb reiterated its view that the Commission's 10-degree default separation angle for co-frequency NGSO FSS operations is outdated and no longer feasible. OneWeb believes the Commission should consider harmonizing its rules with the ITU and instead utilize the Delta-T criteria to establish an in-line interference event between satellites of different NGSO constellations. OneWeb expressed its view that retaining the current, overly-restrictive rule could stymie the deployment of NGSO FSS systems, resulting in unnecessary delays in the provision of critical, satellite-based broadband services to consumers.

Pursuant to Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), this letter is being filed in ECFS and mailed to the meeting participants. Please do not hesitate to contact the undersigned with any questions.

Very truly yours,

/s/ David Carmen

David Carmen

CC: Rachael Bender, Office of Chairman Pai