

September 17, 2018

BY EFILE

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

Re: *Ex Parte Notice, Revision or Elimination of Rules Under the Regulatory Flexibility Act, 5 U.S.C. § 610, CB Docket No. BO 16-251; 2016 Biennial Review of Telecommunications Regulations, IB Docket No. 16-131*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules,¹ this letter provides notice that on September 17, 2018, Iridium Communications Inc., represented by Maureen C. McLaughlin, Vice President Public Policy, Joseph Godles of Goldberg, Godles, Wiener & Wright LLP, and the undersigned spoke via teleconference with the following members of the International Bureau's Satellite Division: Jose Albuquerque, Chief; Kerry Murray, Deputy Chief; and Paul Blais, Chief, Systems Analysis Branch.

In response to the Commission's request for comment on proposals to revise or eliminate unnecessary regulations as part of the 2016 Biennial Review,² Iridium has proposed changes to Section 25.118 to simplify the process for blanket authorization holders to add transceiver/antenna combinations to their blanket license so long as their operational parameters are consistent with existing authorizations and therefore do not increase interference potential.³ During the call, Iridium outlined a proposal to move the contents of Section 25.118(a)(4) of its rules to Section 25.118(b).

¹ 47 C.F.R. § 1.1206.

² *Commission Seeks Public Comment in 2016 Biennial Review of Telecommunications Regulations*, Public Notice, FCC 16-149 (rel. Nov. 3, 2016).

³ Letter from Patrick R. Halley and Lynne M. Montgomery, CB Docket No. BO 16-251; IB Docket No. 16-131, Counsel to Iridium, to Marlene H. Dortch, Secretary (filed Feb. 1, 2018); Letter from Patrick R. Halley and Lynne M. Montgomery, CB Docket No. BO 16-251; IB Docket No. 16-131, Counsel to Iridium, to Marlene H. Dortch, Secretary (filed Jun. 9, 2017).

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The result would be that certain changes to earth stations that qualify as minor modifications could be made without filing a notification with the Commission. Section 25.118(a)(4) currently allows earth station licensees to make certain minor modifications to their earth station authorizations provided they notify the Commission of the change within 30 days. Moving the modifications permitted under Section 25.118(a)(4) to Section 25.118(b) would permit earth station modifications, including modifications to blanket earth station licenses, to be made without notification to the Commission when they do not involve:

- (i) An increase in EIRP or EIRP density (either main lobe or off-axis);
- (ii) Additional operating frequencies;
- (iii) A change in polarization;
- (iv) An increase in antenna height;
- (v) Antenna repointing beyond any coordinated range; or
- (vi) A change from the originally authorized coordinates of more than 1 second in latitude or longitude for stations operating in frequency bands shared with terrestrial systems or more than 10 seconds of latitude or longitude for stations operating in frequency bands not shared with terrestrial systems.⁴

In addition, the Commission should clarify that the addition of new transceiver and antenna combinations to an existing blanket earth station license are modifications that do not require prior Commission notification when they meet the requirements currently listed in 25.118(a)(4). The Commission should include these modifications in the revised Section 25.118(b). A redline of the current rules in Section 25.118 reflecting Iridium's proposed changes is included in Exhibit A.

The requested rule change will reduce the regulatory burden on both earth station operators and Commission staff. The types of modifications discussed under current 25.118(a)(4), as well as the addition of transceiver and antenna combinations to an existing blanket earth station license, do not raise interference concerns and will not otherwise impact other providers. Therefore, it is not necessary to require notification for such minor modifications.

Please direct any questions concerning this submission to the undersigned.

Sincerely,

/s/ Patrick R. Halley

Patrick R. Halley

Counsel to Iridium Communications Inc.

⁴ 47 C.F.R. § 25.118(b). The proposed revision to 25.118 is attached as Exhibit A.

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cc: Jose Albuquerque
Kerry E. Murray
Paul Blais

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EXHIBIT A

§25.118 Modifications not requiring prior authorization.

(a) *Earth station modifications, notification required.* Earth station licensees may make the following modifications without prior Commission authorization, provided they notify the Commission, using FCC Form 312 and Schedule B, within 30 days of the modification. The notification must be filed electronically through the International Bureau Filing System (IBFS) in accordance with the applicable provisions of part 1, subpart Y of this chapter.

(1) Blanket-licensed earth station operators may add remote terminals operating on a primary basis without prior authorization, provided they have complied with all applicable frequency coordination procedures in accordance with §25.251.

(2) A licensee providing service on a private carrier basis may change its operations to common carrier status without obtaining prior Commission authorization. The licensee must notify the Commission using FCC Form 312 within 30 days after the completed change to common carrier status.

(3) An earth station operator may change a point of communication without prior authorization, provided the operator does not repoint the earth station's antenna beyond any coordinated range; and

(i) The change results from a space station relocation described in paragraph (e) of this section, or

(ii) The new point of communication is a replacement GSO space station within $\pm 0.15^\circ$ of orbital longitude of the same location, with authority to serve the U.S., and the change does not entail any increase in the earth station's EIRP or EIRP density.

~~(4) Licensees may make other changes to their authorized earth stations without prior authority from the Commission, provided the modification does not involve:~~

~~(i) An increase in EIRP or EIRP density (either main lobe or off-axis);~~

~~(ii) Additional operating frequencies;~~

~~(iii) A change in polarization;~~

~~(iv) An increase in antenna height;~~

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~~(v) Antenna repointing beyond any coordinated range or~~

~~(vi) A change from the originally authorized coordinates of more than 1 second in latitude or longitude for stations operating in frequency bands shared with terrestrial systems or more than 10 seconds of latitude or longitude for stations operating in frequency bands not shared with terrestrial systems.~~

~~(b) Earth station modifications, notification not required. Notwithstanding paragraph (a) of this section, equipment in an authorized earth station may be replaced without prior authorization and without notifying the Commission if~~

~~(1) Equipment in an authorized earth station may be replaced without prior authorization and without notifying the Commission if~~ the new equipment is electrically identical to the existing equipment.

~~(2) Licensees may make other changes to their authorized earth stations, including the addition of new transceiver/antenna combinations, without prior authority from notifying the Commission, provided the modification does not involve:~~

~~(i) An increase in EIRP or EIRP density (either main lobe or off-axis);~~

~~(ii) Additional operating frequencies;~~

~~(iii) A change in polarization;~~

~~(iv) An increase in antenna height;~~

~~(v) Antenna repointing beyond any coordinated range; or~~

~~(vi) A change from the originally authorized coordinates of more than 1 second in latitude or longitude for stations operating in frequency bands shared with terrestrial systems or more than 10 seconds of latitude or longitude for stations operating in frequency bands not shared with terrestrial systems~~