

December 17, 2018

VIA ELECTRONIC FILING

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

Re: SES Americom, Inc. and O3b Limited, Notice of Ex Parte Presentation, WorldVu Satellites Limited LLC, Call Sign S2994, File No. SAT-AMD-201800104-00004 and Call Sign S2963, File No. SAT-MOD-20180319-00022; and *Use of Spectrum Bands Above 24 GHz For Mobile Radio Service, et al.*, GN Docket No. 14-177; IB Docket Nos. 15-256 & 97-95; RM-11664; WT Docket No. 10-112

Dear Ms. Dortch:

On December 13, 2018, Suzanne Malloy, Will Lewis, Zach Rosenbaum, Noah Cherry, and Kelsie Rutherford representing SES Americom, Inc. and O3b Limited (collectively “SES”), met with representatives of the International Bureau to discuss the above-referenced proceedings. The IB representatives included Jose Albuquerque, Kal Krautkramer, and Stephen Duall, who joined the meeting on the phone.

During the meeting, SES argued that the OneWeb Amendment and Modification applications are speculative and would undermine the Commission’s processing round framework. The Amendment violates the anti-warehousing provisions of Section 25.137(d)(5), which prohibit having two unbuilt systems in the same band, and OneWeb’s Modification is similarly speculative. OneWeb has provided no public interest rationale for the significant expansion of the constellations sought in the Amendment and the Modification; instead, each application represents the type of behavior OneWeb has condemned as inappropriate warehousing.¹ Moreover, the proposals conflict with recent statements by OneWeb indicating that fewer satellites will be required for the first-generation rollout of its Ku/Ka-band system, highlighting the absence of any urgency for the Commission to consider vastly increasing the number of satellites OneWeb is authorized to deploy.

At a minimum, SES emphasized that neither the Amendment nor the Modification can be considered as part of the pending processing rounds. Contrary to OneWeb’s assertions, the proposed changes in the applications would clearly increase interference to

¹ See *In re Space Exploration Holdings, LLC, Application for Approval for Orbital Deployment and Operating Authority for the Space Exploration Holdings NGS0 Satellite System*, Comments of WorldVu Satellites Limited, at 2-7 (filed June 26, 2017).

other systems. Including the applications in the processing rounds would therefore violate Commission policy² and disadvantage legitimate participants in the rounds.

SES urged the Commission to consider modifying its proposal for a sharing regime in the 50 GHz band.³ SES argued that basing the standards for siting of 50 GHz earth stations on the rules applicable in the 24 GHz band is inappropriate because the bands have very different characteristics. SES urged the Commission to confer greater flexibility for earth station siting in the 50 GHz spectrum, consistent with the likelihood that terrestrial use of the spectrum will be limited by propagation considerations.

Please contact me if you have questions about this submission.

Respectfully submitted,

SES Networks

/s/ Will Lewis

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² The NGSO Order makes clear that “The purpose of the recent processing rounds was to establish a sharing environment among NGSO systems, to provide a measure of certainty in lieu of adopting an open-ended requirement to accommodate all future applicants.” *In the Matter of Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, IB Docket No. 16-408, ¶ 61.

³ *Use of Spectrum Bands Above 24 GHz For Mobile Radio Service, a Report and Order, Memorandum Opinion and Order, and Third Further Order of Proposed Rulemaking*, FCC 18-73 (rel. June 8, 2018).