

November 10, 2014

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Comprehensive Review of the Licensing and Operating Rules for Satellite Services, IB Docket No. 12-267 – *Ex Parte Notice*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this ex parte notice is being submitted to summarize the discussion at the Federal Communications Bar Association, International Telecommunications Committee's Brown Bag Lunch that was held on November 6, 2014 at the law offices of Hogan Lovells LLP at 555 Thirteenth Street, NW in Washington, DC.

Present at the meeting on behalf of the Federal Communications Commission, International Bureau, Satellite Division were: Jose Albuquerque, Chief; Karl Kensinger, Deputy Division Chief; Chip Fleming, Chief Engineer; Stephen Duall, Branch Chief, Policy Branch; and William Bell, Lynne Montgomery, Alyssa Roberts, Cindy Spiers, Merissa Velez, and Jay Whaley of the Policy Branch.

On the panel were: the above mentioned Jose Albuquerque; Jennifer Manner, Vice President, Regulatory Affairs, EchoStar Satellite Operating Corporation and Hughes Network Systems, LLC; Daniel Mah, Regulatory Counsel, SES; Stephen Goodman, Partner, Butzel, Long; and John Janka, Partner, Latham & Watkins LLP. Mr. Goodman moderated the discussion. In addition to the above, Tony Lin, Associate, Hogan Lovells LLP and Bruce Olcott, Partner, Jones Day spoke during the discussion.

Mr. Janka discussed the evolution of changes to the licensing regime for satellite authorizations and how they compare to other licensing approaches that are based more on satisfying the ITU's requirements. Mr. Janka also discussed the desirability of affording flexibility to the industry by seeking to define broadly the interference environment within which satellites must operate, instead of imposing granular requirements.

Mr. Mah made observations about the proposed changes to the ITU filing process, changes to the milestones and bond requirements, the two degree spacing rule, and raised questions relating to foreign-licensed satellites and the permitted space stations list.

Ms. Manner discussed the need for the rules to be more flexible and provide clarity, the desire for a more technology neutral approach, changes or alternatives to the bond requirement in general, *e.g.* a corporate guarantee, the legality of a bond requirement at the ITU stage and the need for increased fleet management flexibility.

Mr. Olcott asked why the Commission did not reach any tentative conclusions in the section of the FNPRM that proposed changes to the milestone and bonds. Mr. Lin asked whether the Commission will take into account the unique issues with CubeSats as the FCC moves forward with changes to part 25 of its rules, which led to a discussion on how CubeSats fit in to the licensing scheme and how they are affected by regulatory fees and bond requirements.

Respectfully Submitted,

/s/

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