



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
MCLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wileyrein.com

May 15, 2015

Jennifer D. Hindin
202.719.4975
jhindin@wileyrein.com

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

Re: Notice of Oral *Ex Parte* Presentation; Assessment and Collection of
Regulatory Fees, MD Docket Nos. 14-92, 13-140, and 12-201

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter notifies the Commission that on May 13, 2015, Patricia Cooper and Susan Crandall of Intelsat, and Jennifer Hindin and Gregg Elias of Wiley Rein LLP and counsel for Intelsat, met with Erin McGrath, Legal Advisor to Commissioner Michael O'Rielly, regarding the above-referenced proceedings proposing to reform the Commission's policies and procedures for assessing and collecting regulatory fees.

During the meeting, Intelsat reviewed the Commission's proposal to assess regulatory fees on non-U.S.-licensed satellite operators that have been granted U.S. market access.¹ Consistent with its comments filed in this proceeding, Intelsat discussed how burdensome regulatory fees place U.S. satellite operators at a competitive disadvantage compared to foreign-licensed competitors that do not have to pay these costly fees, despite the fact that foreign-licensed satellite operators utilize Commission resources.² Last year, the Commission declined to adopt a regulatory fee category for non-U.S. licensed space stations due to the "complexities" of the proposal and the need for further review of the FCC's authority to assess such a fee and the policy implications if other countries decided to follow this example.³ Intelsat urged the Commission to commence the necessary further review of this issue so that the Commission has the information needed to adopt this important reform as soon as possible.

¹ *Assessment and Collection of Regulatory Fees for Fiscal Year 2014*, Notice of Proposed Rulemaking, Second Further Notice of Proposed Rulemaking, and Order, MD Docket Nos. 14-92, 13-140, and 12-201, FCC 14-88, ¶¶ 47-50 (rel. June 13, 2014).

² *See* Reply Comments of Intelsat License LLC, MD Docket Nos. 14-92, 13-140, and 12-201 (filed Jul. 21, 2014); Comments of Intelsat License LLC, MD Docket Nos. 14-92, 13-140, and 12-201 (filed Jul. 7, 2014).

³ *Assessment and Collection of Regulatory Fees for Fiscal Year 2014*, Report and Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 10767, 10781 (¶ 34) (2014).



Ms. Marlene Dortch
May 15, 2015
Page 2

Please contact the undersigned with any questions.

Sincerely,

/s/ Jennifer D. Hindin

Jennifer D. Hindin
Counsel for Intelsat

cc: Erin McGrath