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July 20, 2015

FILED ELECTRONICALLY

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

**Re: Ex Parte Filing of O3b Limited**  
Comprehensive Review of Licensing and Operating Rules for Satellite Services  
IB Docket No. 12-267

Dear Ms. Dortch:

On July 17, 2015, O3b Limited (“O3b”) discussed by phone the Commission’s Part 25 Further Notice of Proposed Rulemaking (“Part 25 FNPRM”) proceeding<sup>1</sup> with the Satellite Division of the International Bureau. Kerry Murray, Deputy Chief; Chip Fleming, Chief Engineer; Stephen Duall, Policy Branch Chief; Paul Blais, Systems Analysis Branch Chief; Kal Krautkramer, Engineering Branch; Alyssa Roberts, Policy Branch; Merissa Velez, Policy Branch, all of the Satellite Division; and Suzanne Malloy, VP Regulatory Affairs; Hazem Moakkit, VP Spectrum Development; Mariah Shuman, Regulatory Counsel; Will Lewis, Regulatory Counsel; and Jodi Goldberg, Legal Intern, all of O3b, participated in the call.

O3b emphasized the need for Part 25 rules specifically directed toward requirements for non-geostationary fixed-satellite service (“NGSO FSS”) systems. The above-referenced proceeding focuses primarily on updating and streamlining requirements for geostationary

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<sup>1</sup> *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Further Notice of Proposed Rulemaking, IB Docket No. 12-267, FCC 14-142 (rel. Sept. 30, 2014) (“*FNPRM*”).

(“GSO”) systems, an orientation which does not fully account for separate considerations relevant for NGSO FSS systems.<sup>2</sup> As a result, in some instances NGSO FSS systems are not afforded the operational flexibility that is made possible by the more streamlined parameters being developed in the context of GSO systems.<sup>3</sup>

O3b noted that the Commission should ensure, either in the this or a future proceeding, that its rules take full account of NGSO systems, all relevant frequency bands, and factors such as NGSO architectures.

Respectfully submitted,

/s/ Suzanne Malloy  
Vice President of Regulatory Affairs  
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Cc: Kerry Murray  
Chip Fleming  
Paul Blais  
Stephen Duall  
Kal Krautkramer  
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<sup>2</sup> For example, NGSO FSS systems are expected to be primary users of electronically steered antennas currently being refined and deployed. This nascent technology warrants detailed technical consideration, possibly in a future proceeding.

<sup>3</sup> Section 25.220 of the current rules addresses requirements for non-conforming transmit/receive earth station operations, and in doing so references relevant bands by citing to Section 25.218 of the rule. That rule section, however, addresses neither NGSO FSS systems nor the Ka frequency band.