

The Surety & Fidelity Association of America

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August 21, 2015

Via Electronic Filing

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

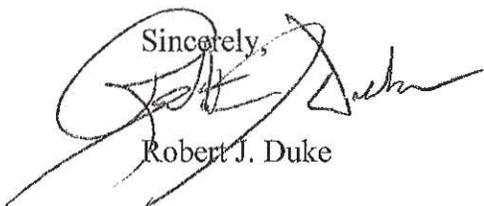
Re: Notice of Oral *Ex Parte* Presentation, Comprehensive Review of Licensing and Operating Rules for Satellite Services, IB Docket No. 12-267

Dear Ms. Dortch:

On August 19, 2015, I, Robert J. Duke of the Surety & Fidelity Association of America (“SFAA”), met with the following staff of the International Bureau: Jose Albuquerque, Chip Fleming, Kerry Murray, Stephen Duall, Clay DeCell, and Diane Garfield (by telephone).

During the meeting, participants discussed the Commission’s proposal to adopt an “escalating” bond requirement.¹ I stated that a surety could increase the penal sum of a bond by fixed amounts annually, via riders, to accommodate a requirement by the Commission that a licensee’s potential payment liability increase progressively over time. Participants also discussed the SFAA comments in this proceeding.²

Sincerely,



Robert J. Duke

cc: Jose Albuquerque
Chip Fleming
Kerry Murray
Stephen Duall
Diane Garfield
Clay DeCell

¹ See *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, IB Docket No. 12-267, Further Notice of Proposed Rulemaking, 29 FCC Rcd 12116, 12129, ¶ 32 (2014).

² Comments of the Surety & Fidelity Association of America, IB Docket No. 12-267 (filed Dec. 1, 2014).