

September 15, 2015

FILED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

**Re: *Ex Parte* Notification
Comprehensive Review of Licensing and Operating Rules
For Satellite Services
IB Docket No. 12-267**

Dear Ms. Dortch:

On September 11, 2015, Bruce Rothaar and Tim Marshall of Kymeta Corporation and I spoke by telephone with the following International Bureau Satellite Division staff: Jose Albuquerque, Chief, Chip Fleming, Chief Engineer, Clay DeCell, Engineering Division and Diane Garfield, Policy Division.

Consistent with previously filed Comments (filed by Kymeta), Reply Comments (filed by SIA) and *ex parte* filings (filed by SIA), Kymeta urged the FCC to modify the off-axis EIRP density mask for conventional GSO Ka-band antennas and conventional GSO Ku-band antennas by removing the “wings” that begin at 19.1° and end abruptly at 48°. Kymeta and SIA independently calculated, and submitted, worst-case analyses (factoring in the allowed exceedance) which demonstrated that eliminating the “wings” would increase interference by a maximum of 0.20 dB or 0.19 dB respectively – a level that is not material.

Kymeta emphasized that the Kymeta/SIA proposal seeks to eliminate the wings in the off-axis mask for both Ka-band and Ku-band antennas. Specifically, the Kymeta/SIA proposal seeks to modify the off-axis mask in the following rule sections:

- Ka-Band: Section 25.138(a)(1) and (2).
- Ku-Band: Sections 25.218(e)(1) and (2); 25.218(f)(1) and (2); 25.222 (Ku-band ESVs); 25.226 (Ku-band VMESs); and 25.227 (Ku-band ESAAs).

Kymeta and SIA do not propose to remove the “wings” from the off-axis mask in Section 25.209.

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Please contact the undersigned if you have any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert S. Koppel". The signature is written in a cursive style with a large, prominent 'R' and 'K'.

Robert S. Koppel
Counsel to Kymeta Corporation

cc (via e-mail):
Jose Albuquerque
Chip Fleming
Clay DeCell
Diane Garfield