

December 9, 2015

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

In accordance with Section 1.1206 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. § 1.1206, this letter notifies the Commission that on December 8, 2015, Hazem Moakkit and Susan Crandall of Intelsat, and Jennifer Hindin of Wiley Rein LLP and counsel for Intelsat, met with Erin McGrath of Commissioner O'Rielly's office to discuss the FCC's two-degree spacing policy under consideration in the above-referenced proceeding.

Intelsat reiterated that the two-degree spacing policy is outdated, no longer serves the interests of the United States and its consumers, and today confers a competitive advantage on foreign-licensed satellite operators with U.S. market access – an advantage that would not be reciprocated to U.S. licensees serving the home markets of those foreign operators. Intelsat argued that although it believes the two-degree rules should be eliminated, the Commission – at a minimum – should allow operations at previously coordinated levels.

Please contact the undersigned with any questions.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Associate General Counsel

cc: Erin McGrath