

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; Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Federal Communications Commission's ("Commission" or "FCC") 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 Commissioner Rosenworcel and her legal advisor, Johanna Thomas, to discuss the FCC's Part 25 reform under consideration in the above-referenced proceeding.

Intelsat discussed the competitiveness of the satellite industry and expressed concern that the FCC's satellite licensing rules may disadvantage U.S. licensed satellite operators and thus encourage satellite operators to license through foreign administrations and then seek U.S. market access. In particular, Intelsat expressed its view that the two-degree spacing policy is outdated, no longer serves the interests of the United States and its consumers, and today confers a competitive advantage on foreign-licensed satellite operators with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.

Intelsat also supported the FCC proposal for the United States to make International Telecommunication Union ("ITU") satellite network filings in advance of an entity filing a U.S. satellite license application. ITU filings are essentially real estate in space. The U.S. should want to ensure it has access to these vital assets through adoption of regulatory policies that encourage operators to seek U.S. licenses and enable U.S. licensees to compete globally on an equitable basis.

Finally, Intelsat stated that Commission proposals to allow terrestrial mobile services to operate in satellite spectrum must ensure that existing satellite services – such as video distribution to millions of Americans – do not experience harmful interference. Intelsat noted that technical studies performed by competent ITU study groups have demonstrated that terrestrial mobile operations are technically incompatible with satellite services operating in C-band.

Please contact the undersigned with any questions.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Associate General Counsel

cc: Commissioner Jessica Rosenworcel
Johanna Thomas