From: Joseph A. Godles
Sent: Thursday, December 10, 2015 6:11 PM
To: louis.peraertz@fcc.gov
Cc: Maureen McLaughlin
Subject: Part 25 proceeding (IB Docket No. 12-267)

In a meeting today with a Commissioner's legal advisor, we learned that the Report and Order in the Part 25 rulemaking may require that a bond be posted when papers are filed with the International Telecommunication Union ("ITU") for a satellite system or network. The bond would facilitate a new procedure under which papers for geostationary satellite orbit ("GSO")-like satellites could be submitted to the ITU before a GSO-like satellite application is filed with the Commission.

It was unclear from the meeting whether the new bond requirement would have any impact on non-geostationary satellite orbit ("NGSO")-like satellites. Iridium submits that the new bond requirement should not apply to NGSO-like satellites, because even under present FCC practice ITU papers can be forwarded to the ITU before an NGSO-like satellite application is filed with the Commission. The need for a change in the practice for GSO-like satellites arises from the first come, first served queue that the Commission has for processing GSO-like satellite applications. There is no queue for processing NGSO-like satellite applications, which instead are grouped in processing rounds.