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February 3, 2016

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 February 3, 2016, Dick Evans of Intelsat, and myself, on behalf of Kymeta Corporation, spoke by telephone with Clay DeCell and Chip Fleming of the International Bureau's Satellite Division.

Mr. Evans and I noted that there appeared to be certain inconsistencies regarding permitted exceedances for Ka-band earth stations compared with Ku-band earth stations. Specifically, we noted the following with regard to permitted exceedances for co-polarized signals in the plane perpendicular to the GSO arc. Sections 25.218(f)(1) and (2), governing conventional Ku-band earth station terminals, provide for exceedances up to 6 dB in the region of the main reflector spillover energy, and up to 6 dB for angular ranges up to 10% outside the region of the main spillover energy. By contrast, Section 25.138(a)(3), governing conventional Ka-band earth stations, provides for exceedances up to 3 dB for angular ranges up to 10% outside 7 degrees, and does not provide for exceedances in the region of the main reflector spillover energy.

Mr. Evans and I asked whether the inconsistencies were inadvertent, and thus, could be changed by the issuance of an Erratum. Staff advised us that the different exceedances were consistent with the text of the Further Notice of Proposed Rulemaking, and with paragraph 157 of the Second Report and Order, and therefore, the differences were not inadvertent. I advised the staff that Kymeta has no plans to seek further action regarding these differences.

Please contact the undersigned if you have any questions.

Respectfully submitted,

Robert S. Koppel

Robert S. Koppel
Counsel to Kymeta Corporation

cc (via e-mail):

Dick Evans, Intelsat
Chip Fleming
Clay DeCell