



April 1, 2016

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Notice of *Ex Parte* – IB Docket 02-34 Amendment of the Commission’s Space Station Licensing Rules and Policies and IB 02-54 Mitigation of Orbital Debris; IB Docket No. 12-267 Comprehensive Review of Licensing and Operating Rules for Satellite Services**

Dear Ms. Dortch:

On March 30, 2016, representatives of the Satellite Industry Association Regulatory Working Group (“SIA RWG”)<sup>1</sup> met with FCC staff to offer inputs pertaining to the above-referenced proceedings. The portion of the discussion relevant to the above-referenced proceedings followed the attached SIA talking points on: § 25.157 with regards to the “one-third” sharing metric, NGSO/NGSO

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<sup>1</sup> SIA is a U.S.-based trade association providing representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. Since its creation twenty years ago, SIA has advocated on behalf of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business. SIA Executive Members include: The Boeing Company; DIRECTV LLC; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado; Lockheed Martin Corporation; Northrop Grumman Corporation; SES Americom, Inc.; Space Exploration Technologies Corp.; SSL; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Airbus DS SatCom Government, Inc.; Artel, LLC; Cisco; Comtech EF Data Corp.; DRS Technologies, Inc.; Eutelsat America Corp.; Global Eagle Entertainment; Glowlink Communications Technology, Inc.; Hughes; iDirect Government Technologies; Inmarsat, Inc.; Kymeta Corporation; Marshall Communications Corporation.; MTN Government; O3b Limited; Orbital ATK; OneWeb; Panasonic Avionics Corporation; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; Vencore Inc.; and XTAR, LLC.

sharing, NGSO FSS Processing Rounds, Milestone Completion, NGSO FSS Geographic Coverage, and Replacement Satellites.

Attending on behalf of the SIA RWG were: Charity Weeden, SIA; Bob Koppel (for Kymeta), Bill Wiltshire, Harris, Wiltshire, and Grannis (for SpaceX), Giselle Creeser, Inmarsat; John Janka, Latham & Watkins (for ViaSat); Suzanne Malloy, O3b; Candace DeVane, Intelsat; Joe Godles, Goldberg, Godles, Wiener & Wright (for Iridium); Bruce Olcott Jones Day (for Boeing); Mariah Shuman, O3b; Thomas Tycz, Goldberg, Godles, Wiener & Wright (for Iridium); Scott Kotler, Lockheed Martin; Patricia Cooper, SpaceX; Fernando Carrillo, EchoStar; Chris Murphy, ViaSat; Chris Hofer, ViaSat; Whitney Lohmeyer, OneWeb; Zach Rosenbaum, O3b; Jack Wengyniuk AT&T Entertainment Group (for DirecTV); John Forsey, Telesat; and Rich Leshner, Planet Labs.

Attending on behalf of the FCC were: Jose Albuquerque, Kerry Murray, Jennifer Balatan, Cindy Spiers, Chip Fleming, Stephen Duall, Paul Blais, Clay DeCell, and Troy Tanner.

Please contact the undersigned with any questions related to this filing.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION

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cc (via e-mail):  
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Kerry Murray  
Chip Fleming  
Jennifer Balatan  
Cindy Spiers  
Stephen Duall  
Paul Blais  
Clay DeCell  
Troy Tanner