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June 10, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: O3b Limited, Notice of *Ex Parte* Presentation
Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al., GN
Docket No. 14-177, IB Docket Nos. 15-256 & 97-95; RM-11664; WT Docket
No. 10-112**

Dear Ms. Dortch:

On June 8, 2016 Steve Collar, CEO of O3b Limited, Suzanne Malloy, Vice President, Regulatory Affairs of O3b, and John Hane of Pillsbury Winthrop Shaw Pittman LLP, counsel to O3b, met separately with Edward Smith, Legal Advisor to Chairman Wheeler; Commissioner Pai and Brendan Carr, his legal advisor; Commissioner Clyburn and Daudeline Meme and David Nayer, her Legal Advisor and Law Clerk (respectively); and Commissioner O’Rielly and Erin McGrath, his legal advisor. In the meetings we reviewed O3b’s position on issues in the above-captioned proceeding of particular importance to FSS operators generally and NGSO FSS operators in particular. Our discussion centered on issues involving the 27.5-28.35 GHz band (the “28 GHz band”) and emphasized the following points:

- O3b has created a new market, providing very high throughput, low latency trunking for carriers and government/military/enterprise with the performance of terrestrial networks in places those networks do not reach. O3b allows mobile broadband to be extended to areas in which provision of terrestrial backhaul is economically infeasible (remote areas) or impossible (onboard military and civilian vessels while underway).
- Large, exclusive geographic area licenses are inappropriate for the 28 GHz band. With appropriate safeguards sharing is feasible. FSS requires relatively small areas for earth station uplinks, while terrestrial use will also be confined to relatively small geographic areas. Awarding large, exclusive license areas would prevent FSS operators from making extremely productive use of the 28 GHz band, even in the vast areas that will be unserved by UMFU licensees.

- O3b is very supportive of 5G because terrestrial operators are O3b customers. But given the implications for U.S. service and elsewhere, the Commission needs to find a practical approach to sharing that permits growth and avoids disruption of provision of FSS. O3b's U.S. individually licensed earth stations are essential to O3b's service in the Americas and throughout the Pacific. There is no technical bar to co-existence of satellite and UMFU. An appropriate sharing regime for FSS and UMFU can be developed, but the stakes are extremely high and the Commission must get the sharing mechanisms right.
- Grandfathering existing and applied for earth stations with primary status is necessary but not sufficient. O3b must have reasonable access within the U.S. to build new earth stations. One site per county will not work. Along with locations for new individually licensed earth stations at or near existing sites, O3b needs the ability to be licensed for new earth stations at customer premises. FSS earth stations must have the status of primary – they cannot be subject to being shut down once built.
- O3b's satellites must be protected from uplink interference from terrestrial operations. Because little is known about future UMFU deployment, the point at which aggregate terrestrial emissions would interfere with a satellite can be debated. But the Commission must take measures to ensure that terrestrial emissions remain below the threshold, and that emissions can be reduced quickly should the threshold be exceeded.
- The most efficient approach to satellite-UMFU sharing can only be found through industry consensus. The Commission must incentivize all stakeholders to compromise. It should not rush to adopt technical sharing parameters that do not have broad consensus among UMFU proponents and satellite operators.

Please contact me if you have questions about this submission.

Respectfully submitted,

O3b Limited

/s/ Suzanne Malloy
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