

June 12, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: Permitted *Ex Parte* Presentation in RM 11429

Dear Secretary Dortch:

On June 11, 2008, representatives of the Global VSAT Forum (“GVF”) met with Brent Greenfield, Attorney in the Wireless Telecommunications Bureau. Participating in the meeting on behalf of GVF were Matthew Botwin, Consultant to Intelsat and Chairman of the GVF Regulatory Working Group, Audrey Allison, The Boeing Company, Keith Apple and Stephen Baruch, Leventhal Senter & Lerman on behalf of Hughes Network Systems, Steve Dorion, Hughes Network Systems, Sallye Clark, Arent Fox, on behalf of Arrowhead and Caprock Communications, Joslyn Read, SES New Skies, and the undersigned on behalf of GVF.

The meeting focused on the concerns of GVF members regarding the likelihood of harmful interference from potential secondary fixed services (“FS”) into primary fixed satellite service (“FSS”) networks and secondary mobile-satellite service (“MSS”) networks in the 14.0-14.5 GHz band. GVF members include companies that construct and operate VSAT networks that provide critical broadband services to commercial and government customers throughout the world. Many of these networks operate in the 14.0-14.5 GHz band using central Hub facilities and millions of blanket-licensed small remote terminals ubiquitously-deployed throughout the United States. The participants explained how interference into FSS and MSS networks in the 14.0-14.5 GHz band from even a few FS terminals of the type proposed by the petitioners in RM 11429 would disrupt the operations of these important global communications systems.

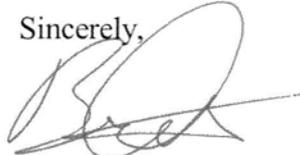
GVF members also raised concerns about the incompatibility of FS networks in the 14.0-14.5 GHz band with the regulatory requirements of the International Telecommunication Union (“ITU”) Radio Regulations (“RRs”). The ITU RRs do not contain any FS allocation in the 14.0-14.4 GHz band in ITU Region II, and thus do not permit FS operations, unless they are conducted on a non-harmful interference, non-protected basis with respect to other services. This includes, of course, satellite networks licensed by other countries that receive transmissions in the 14.0-14.4 GHz band. The proposal of Winchester Cator, LLC and the Utilities Telecom Council (“UTC”) seeks to operate FS networks in the 14.0-14.5 GHz band in a manner that would not

meet this requirement with respect either to primary FSS or secondary MSS operations that are conducted over FSS satellites.

GVF members also raised questions about whether the spectrum requirements of UTC would be better served using one of the existing, underutilized FS spectrum allocations in the United States. Finally, GVF members urged the Commission to refrain from issuing a Notice of Proposed Rulemaking in response to RM 11429.

Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Olcott", with a long horizontal flourish extending to the right.

Bruce A. Olcott

Copy: B. Greenfield