



August 31, 2012

Via ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street N.W.  
Washington, D.C. 20544

Dear Ms. Dortch:

**Re: Notice of Ex Parte Presentation – Petition for Rulemaking RM-11640  
*Amendment of the Commission’s Rules to Establish a Next-Generation Air-Ground Communications Service on a Secondary Licensed Basis in the 14.0 to 14.5 GHz Band***

On August 30, 2012, representatives of the Satellite Industry Association (“SIA”) met with the following staff members of the Federal Communication Commission’s International Bureau and Office of Engineering and Technology: Howard Griboff, Sci-Byung K. Yi, Kate Collins, Julius Knapp, Jennifer Manner, Ira Keltz, Geraldine Matisse, and Brian Butler. Attending on behalf of SIA were Patricia Cooper and Sam Black. In addition, the following representatives of SIA members were in attendance in person or by teleconference: Daniel C.H. Mah and Stephen McNeil, Telecomm Strategies (for SES); Susan Crandall and Jose Albuquerque (for Intelsat); Stephen Baruch (for Hughes); Carlos Nalda (for Panasonic); Daryl Hunter (for ViaSat); and George Wazeter (for Telesat).

The SIA reiterated its opposition to the above-referenced Petition for Rulemaking, for the reasons set forth in the SIA comments submitted in this proceeding. In addition, the SIA provided information about the extensive use of the Ku-band for satellite services to illustrate the importance of the 14.0-14.5 GHz band to the satellite industry. The SIA also provided an additional technical analysis prepared by Stephen McNeil, Telecom Strategies, to demonstrate the incompatibility of the proposed secondary air-ground communications service with ubiquitously deployed, primary Ku-band fixed-satellite services in the same band. In light of the extensive use of the band by the satellite industry, this threshold incompatibility militates against the introduction of a new secondary service in the 14.0-14.5 GHz band.

Attached for the record is a copy SIA’s presentation to the Commission staff, as well as a copy of Mr. McNeil’s technical analysis. One copy of this notice of ex parte

presentation (with attachments) is being submitted electronically via the Commission's Electronic Comment Filing System.

Please contact Patricia Cooper or Sam Black if you have any questions.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION

A handwritten signature in black ink that reads "Patricia Cooper". The signature is written in a cursive, flowing style.

Patricia Cooper, President  
1200 18th St., N.W.  
Suite 1001  
Washington, D.C. 20036  
U.S.A.

cc:

Howard Griboff, International Bureau  
Sci-Byung K. Yi, International Bureau  
Kate Collins, International Bureau  
Julius Knapp, Office of Engineering and Technology  
Jennifer Manner, Office of Engineering and Technology  
Ira Keltz, Office of Engineering and Technology  
Geraldine Matisse, Office of Engineering and Technology  
Brian Butler, Office of Engineering and Technology