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May 10, 2013

FILED ELECTRONICALLY

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

Re: Notice of Oral *Ex Parte* Presentations – Procedures for Assessment and Collection of Regulatory Fees; Assessment and Collection of Regulatory Fees for Fiscal Year 2008, MD Docket Nos. 12-201 & 08-65

Dear Ms. Dortch:

On May 9, 2013, several satellite company representatives met separately with David Goldman, Senior Legal Advisor to Commissioner Rosenworcel, and Louis Peraertz, Legal Advisor to Commissioner Clyburn, to discuss the above-referenced rulemaking proceeding regarding reform of the Commission's regulatory fees.¹ The satellite company representatives attending the meetings were Daniel Mah of SES, Karis Hastings, outside counsel for SES, and Diane Cornell of Inmarsat, and George Wazeter of Telesat participated by telephone.

The satellite company representatives endorsed the objections set forth in the filings of the Satellite Industry Association to proposals in the Notice that could substantially increase regulatory fees for satellite service providers.² The satellite company representatives also responded to arguments made by Intelsat in this proceeding suggesting that the Commission should consider requiring non-U.S.-licensed satellite operators serving the U.S. market to pay regulatory fees.³ Specifically, the representatives explained that such a change was beyond the scope of the Commission's statutory authority, would conflict with the principles of international

¹ *Procedures for Assessment and Collection of Regulatory Fees and Assessment and Collection of Regulatory Fees for Fiscal Year 2008*, Notice of Proposed Rulemaking, MD Docket Nos. 12-201 & 08-65, FCC 12-77 (rel. July 17, 2012) (the "Notice").

² See Comments of the Satellite Industry Association, MD Docket Nos. 12-201 & 08-65 (filed Sept. 17, 2012); Reply Comments of the Satellite Industry Association, MD Docket Nos. 12-201 & 08-65 (filed Oct. 23, 2012); Letter of Patricia A. Cooper, President, Satellite Industry Association, to Marlene H. Dortch, Secretary, FCC, MD Docket Nos. 12-201 & 08-65 (filed Feb. 15, 2013).

³ See Letter of Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Secretary, FCC, MD Docket Nos. 12-201 & 08-65 (filed Feb. 22, 2013) at 2-3.

comity embodied in U.S. market access policies, and could lead to a proliferation of fees around the world that would have a serious impact on the economics of global satellite services.⁴

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Karis A. Hastings

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cc: David Goldman
Louis Peraertz

⁴ See Letter of Karis A. Hastings, Counsel for SES, to Marlene H. Dortch, Secretary, FCC, MD Docket Nos. 12-201 & 08-65 (filed Mar. 8, 2013) at 2-4.