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July 9, 2014

R. Michael Senkowski
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Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Notice of Oral *Ex Parte* Presentation
RM-11697; IB Docket No. 13-213; RM-11685

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the rules of the Federal Communications Commission ("Commission"),[1] Iridium Constellation LLC ("Iridium"), by its attorneys, hereby notifies the Commission that, on July 7, 2014, Donna Bethea-Murphy, Vice President of Regulatory Engineering, of Iridium, and Jennifer Hindin, Gregg Elias, Ethan Lucarelli, and myself, of Wiley Rein LLP, counsel to Iridium, met with Robert Nelson, Troy Tanner, Jose Albuquerque, and Lynne Montgomery of the Commission's International Bureau to discuss Iridium's revised spectrum proposal, filed in the above-captioned proceedings.[2] The attached presentation was distributed.

In the meeting, Iridium explained that its revised proposal seeks a modest reassignment of spectrum among the two Big LEO Mobile Satellite Service ("MSS") operators that will serve the public interest in the continued growth and development of satellite service. Under the revised proposal, the Commission would provide Iridium with exclusive use of 1.225 MHz of additional spectrum (from 1617.5-1618.725 MHz), and also designate 1.5 MHz of spectrum (from 1616-1617.5) for shared use by the operators. Iridium is capable of putting this additional spectrum to use to serve critical satellite services immediately with its existing satellite constellation, and the spectrum will also drive continued satellite innovation as Iridium transitions to its next generation system, Iridium NEXT.

Iridium stressed that the Commission can and should act promptly on Iridium's proposal. The revised proposal fully addresses all technical concerns raised by Globalstar with respect to Iridium's original proposal under its February 11, 2013

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[1] 47 U.S.C. § 1.1206.

[2] *See* Supplemental Comments of Iridium Constellation LLC, RM-11697, IB Docket No. 13-213, RM-11685 (filed May 5, 2014) ("Iridium Supplemental Comments").

Petition for Rulemaking[3] and is consistent with Globalstar's channelization. Moreover, the proposal will serve the public interest in continued access to critical satellite services, which is particularly important in light of Globalstar's Terrestrial Low Power Service ("TLPS") proposal, which, as Iridium has explained, would eliminate nearly any obligation for Globalstar to provide Big LEO satellite services and would seem to contemplate nationwide exclusion zones for Globalstar's two-way satellite services.[4] Finally, Iridium explained that the Commission has adequate authority and a sufficient record to implement Iridium's proposal immediately via a license modification without the need for a further rulemaking proceeding.[5]

For the foregoing reasons, Iridium respectfully requested the Commission promptly grant Iridium's revised spectrum proposal.

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

Best regards,

/s/ R. Michael Senkowski

R. Michael Senkowski

Attachment

cc: FCC Participants

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[3] Petition for Rulemaking of Iridium Constellation, LLC at 8-12, RM-11697 (filed Feb. 11, 2013)

[4] *See, e.g.*, Reply Comments of Iridium Constellation LLC at 4-9, RM-11697, IB Docket No. 13-213, RM-11685 (filed June 4, 2014) ("Iridium TLPS Reply").

[5] *See* Iridium TLPS Reply at 11-18.

Iridium's Revised Spectrum Proposal

Donna Bethea-Murphy
Vice President, Regulatory Engineering

July 7, 2014

RELIABLE·CRITICAL·LIFELINES

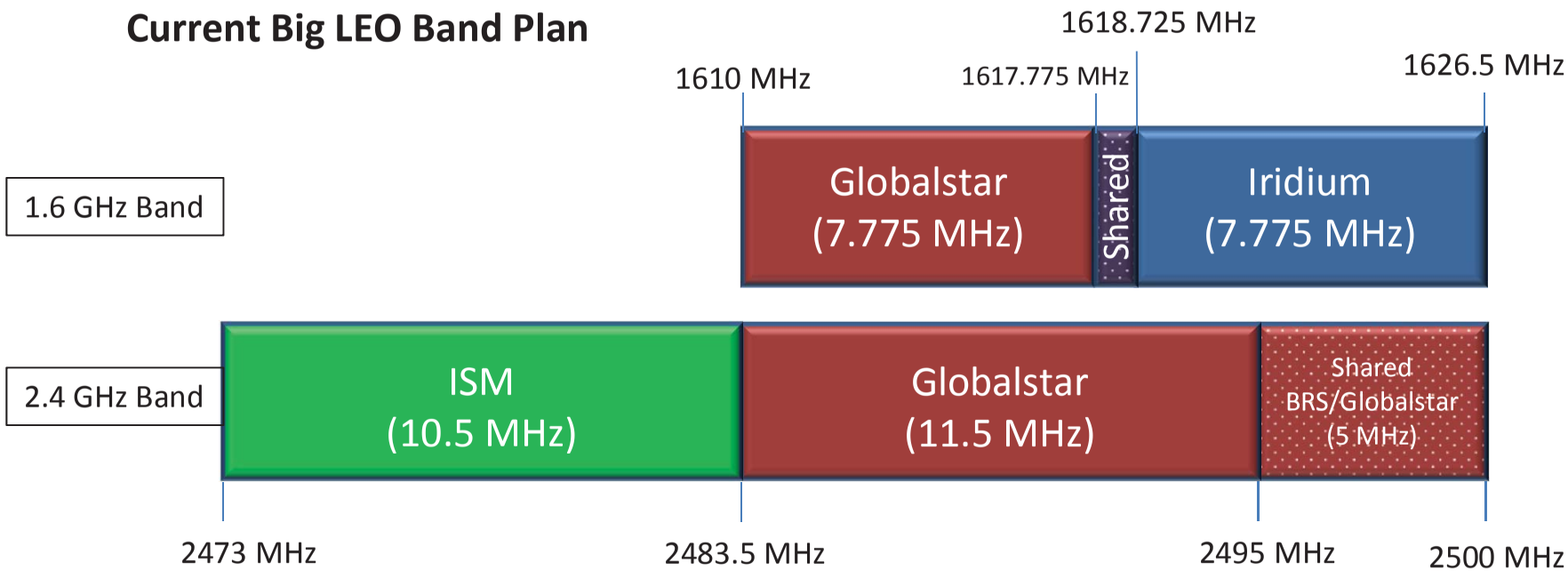
Overview:

- Iridium and Globalstar each have filed Petitions for Rulemaking offering different visions of the future of Big LEO MSS Band
  - Globalstar seeks to annex 10.5 MHz of unlicensed spectrum to deploy a 22 MHz terrestrial service that will block MSS
  - Iridium seeks a modest allocation of additional spectrum to support continued development and growth of satellite services
- Globalstar Opposed Iridium's Petition, citing technical challenges rooted in its chosen channelization
- Iridium revised its proposal to address Globalstar's concerns
- Iridium's revised proposal would afford it additional spectrum to support MSS growth—especially important as Iridium transitions to NEXT and Globalstar shifts its focus to TLPS
- The Commission should promptly act on Iridium's petition

Background: The Big LEO Band

- The Big LEO MSS band was established in 1994 as a shared home for 5 satellite operators
- Since then, the band plan has been modified multiple times; the current two-operator band plan was adopted in 2007
- Under the band plan, Iridium has less than 8 MHz of exclusive unpaired spectrum; Globalstar has more than 19 MHz of exclusive paired spectrum; the operators share 0.95 MHz

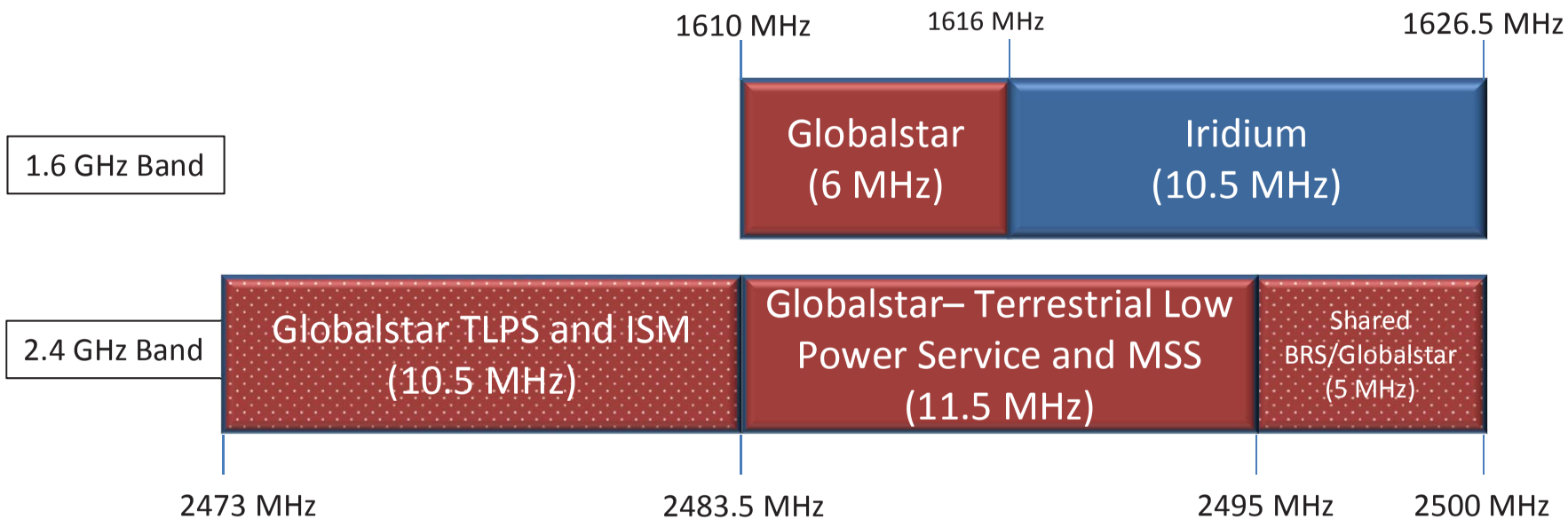
Current Big LEO Band Plan



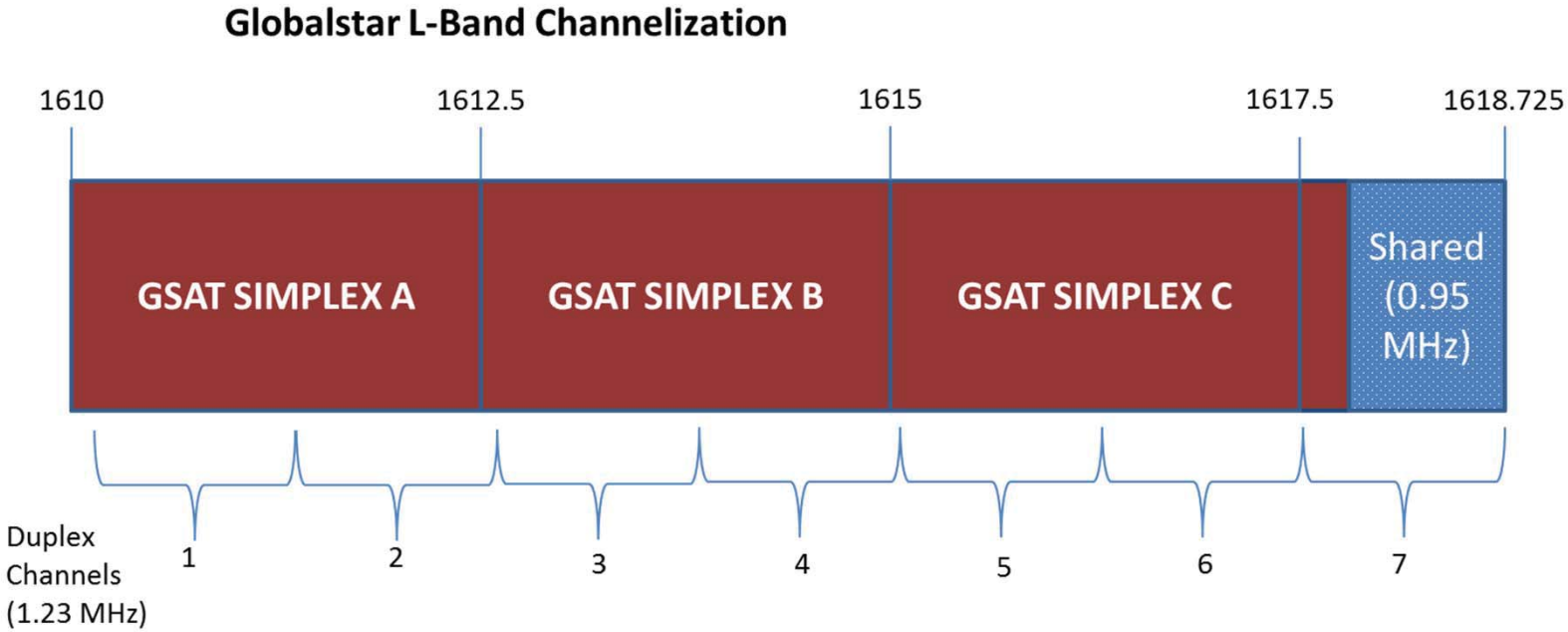
Iridium's Petition for Rulemaking

- February 11, 2013, Iridium filed a Petition for Rulemaking
  - Reassign 2.725 MHz of spectrum (1616-1618.725) for Iridium's exclusive use
  - Ensure sufficient spectrum is available to support growing MSS demand, particularly in light of Globalstar's terrestrial ambitions
  - Maximize the utility of Iridium's current constellation—as well as Iridium NEXT—promoting innovation and enhanced services

Iridium Original Petition for Rulemaking



Globalstar's Opposition

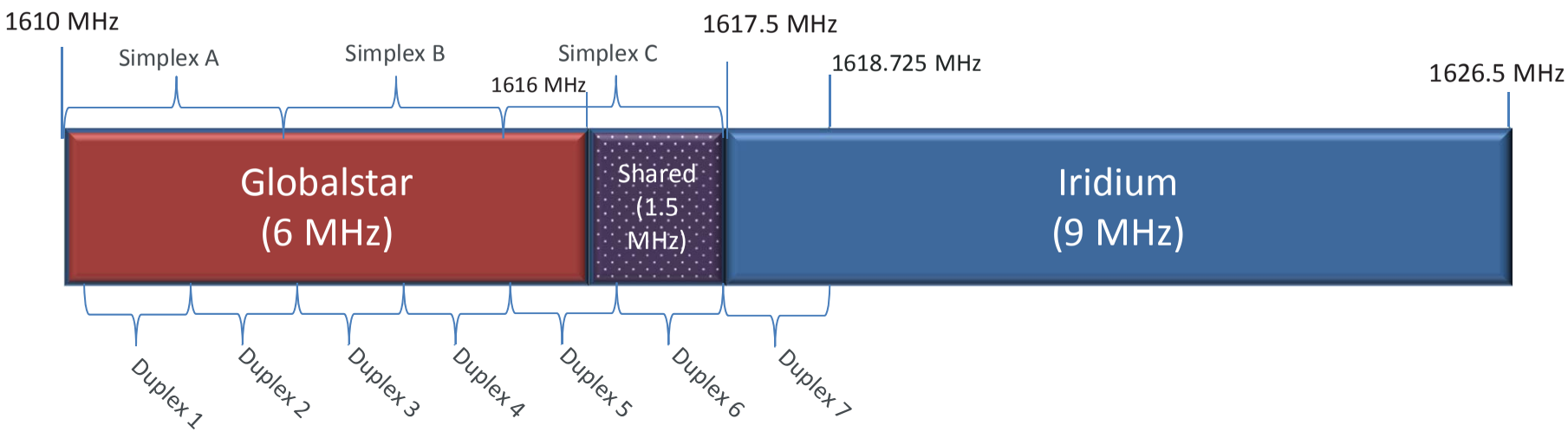


- Claimed Iridium exclusive use from 1616-1618.725 MHz would:
  - Prevent the use of Globalstar's SPOT devices in RAS protection zones
  - Require Globalstar to recall and modify its SPOT devices to prevent their use on simplex Channel C
  - Prevent Globalstar's duplex service from using channels 5 and 6, which are currently used for all of Globalstar's initial access calls to prevent interference with RAS
- Globalstar's Opposition did not assert any current use of Duplex Channel 7

Iridium's Revised Proposal

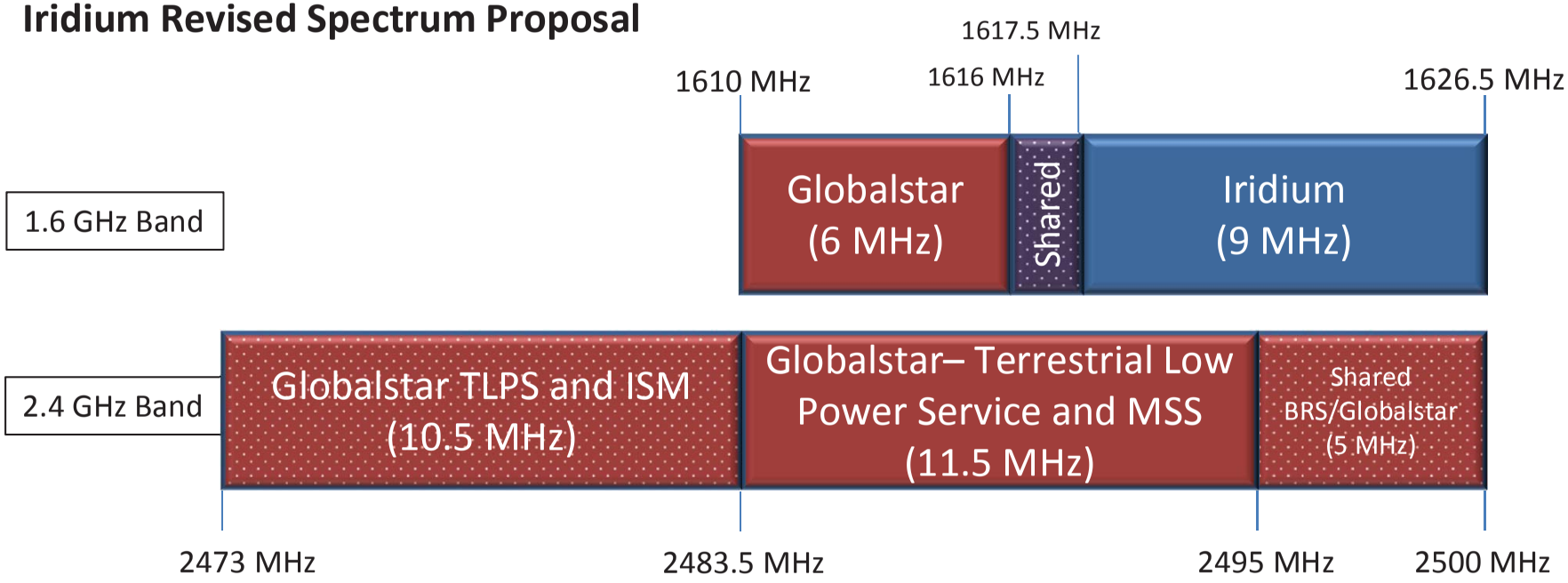
- Iridium submitted a revised proposal (5/5/2014 Supplemental Comments):
  - Provide Iridium with exclusive use of 1.225 MHz of additional spectrum (from 1617.5-1618.725 MHz) beginning at the edge of Globalstar Simplex Channel C
  - Designate 1.5 MHz of spectrum (from 1616-1617.5) for shared use by Iridium and Globalstar

Iridium Revised Spectrum Proposal



The FCC Can and Should Act on Iridium's Proposal

- Fully addresses Globalstar's concerns
  - Globalstar has not demonstrated use above Simplex Channel C—no need to recall/reprogram SPOT devices
  - Globalstar retains access to Duplex Channels 5 and 6—no impact on duplex
- Advance the public interest by ensuring continued access to spectrum for critical satellite services
  - Particularly significant in light of nationwide MSS exclusion zones to be created by TLPS
  - Provide Iridium with an important injection of spectrum—promoting increased innovation and enhanced services
- Can be accomplished via license modification without need for a rulemaking
  - FCC traditionally proceeded via rulemaking in the Big LEO band, but is not required to in this case
  - No rule changes are required, no fundamental changes to the band plan or to either license
  - Globalstar and the public have had ample opportunity to comment

Questions?

Iridium Revised Spectrum Proposal