



July 16, 2014

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of Oral *Ex Parte* Presentation – Comprehensive Review of Licensing and Operating Rules for Satellite Services, IB Docket No. 12-267; FCC Seeks Public Comment on Process Reform, GN Docket No. 14-25

Dear Ms. Dortch:

The Satellite Industry Association (SIA)¹ hereby files this notice of oral *ex parte* presentation in the above-captioned dockets. On July 15, 2014, I and SIA member company representatives met with representatives of the Federal Communications Commission's (FCC) International Bureau (IB) to discuss further modifications that could be made to streamline Part 25 of the FCC's rules and reduce regulatory burdens on the satellite industry. SIA member company representatives in attendance were: Chris Murphy, Vice President, Government Affairs, Inmarsat (and SIA Regulatory Working Group co-chair); Steve Doiron, Senior Director, Regulatory Affairs, Echostar; Phuong Pham of Wilkinson Barker Knauer for EchoStar; Associate General Counsel, Intelsat; Cindy Grady, Regulatory Counsel, Intelsat; Scott Kotler, Director, Technical Regulatory Affairs, Lockheed Martin; Tom Tycz of Goldberg Godles Wiener for Iridium; Daniel Mah, Regulatory Counsel, SES; Zach Rosenbaum, Spectrum Development

¹ SIA is a U.S.-based trade association providing worldwide representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. For more information, visit www.sia.org. SIA Executive Members include: The Boeing Company; The DIRECTV Group; EchoStar Corporation; Harris CapRock Communications; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; LightSquared; Lockheed Martin Corporation.; Northrop Grumman Corporation; SES Americom, Inc.; and SSL. SIA Associate Members include: Artel, LLC; Astrium Services Government, Inc.; ATK Inc.; Cisco; Cobham SATCOM Land Systems; Comtech EF Data Corp.; DigitalGlobe, Inc.; DRS Technologies, Inc.; Encompass Government Solutions; Eutelsat America Corp.; Exelis Inc.; Globecom Systems, Inc.; Glowlink Communications Technology, Inc.; iDirect Government Technologies; Inmarsat, Inc.; Marshall Communications Corporation.; MTN Government; NewSat America, Inc.; O3b Networks; Orbital Sciences Corporation; Panasonic Avionics Corporation; Raytheon Space and Airborne Systems; Row 44, Inc.; TeleCommunication Systems, Inc.; Telesat Canada; The SI Organization, Inc.; TrustComm, Inc.; Ultisat, Inc.; ViaSat, Inc., and XTAR, LLC.

Engineer, SES; and Tom Chinick, SIA Policy Intern. Chris Hofer, Director, Regulatory Affairs of ViaSat participated by telephone.

The FCC officials in attendance were Troy Tanner, Deputy Bureau Chief; Tom Sullivan, Associate Bureau Chief and Chief of Staff; Jennifer Gilsenan, Assistant Bureau Chief; Jose Albuquerque, Satellite Division Chief; Chip Fleming, Chief Engineer, Satellite Division; and William Bell, Attorney Advisor, Policy Branch.

The participants discussed matters related to recommendations of the FCC Staff Working Group Report on Process Reform² and issues deferred for future consideration in the FCC's recent *Report and Order* adopting procedural reforms to the Part 25 rules.³ The IB provided an outline for the matters discussed (attached), which included:

- ITU filings for space stations
- The FCC's two-degree spacing rules
- Milestones and bonds for space station authorizations
- Eliminating unnecessary technical restrictions and mandates on satellite system operations
- Streamlined processing of some space station and earth station modifications
- Further reductions in information required in Schedule S of space station applications

SIA and its member company representatives noted with appreciation the Commission's commitment to ongoing efficiencies and streamlining in Part 25 and the opportunity to discuss these important matters with the FCC.

A copy of this notice and attachment is being emailed to the Federal Communications Commission staff identified below. Please contact the undersigned with any questions related to this filing.

Respectfully,



Patricia Cooper
President
Satellite Industry Association

² FCC Staff Working Group, *Report on FCC Process Reform*, GN Docket No. 14-25, DA 14-199 (Feb. 14, 2014)

³ Comprehensive Review of Licensing and Operating Rules for Satellite Services, *Report and Order*, IB Docket No. 12-267, 28 FCC Rcd 12403 (2013).

Attachment

cc:

Troy Tanner, Deputy Bureau Chief, FCC/IB

Tom Sullivan, Associate Bureau Chief and Chief of Staff, FCC/IB

Jennifer Gilson, Assistant Bureau Chief, FCC/IB

Jose Albuquerque, FCC/IB Satellite Division Chief

Chip Fleming Chief Engineer, FCC/IB/Satellite Division

Williams Bell, Attorney Advisor, FCC/IB/Satellite Division