October 13, 2015

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

Re: Notice of Oral Ex Parte Presentation; Comprehensive Review of Licensing and Operating Rules for Satellite Services, IB Docket No. 12-267

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Federal Communications Commission’s (“Commission”) rules, 47 C.F.R. § 1.1206, this letter notifies the Commission that on October 8, 2015, Susan Crandall, Hazem Moakkit, Roya Shambayati, Candice DeVane, and Dick Evans of Intelsat, and Jennifer Hindin of Wiley Rein LLP and counsel for Intelsat, met with Jose Albuquerque, Kerry Murray, Clay DeCell, Diane Garfield, Stephen Duall, and Chip Fleming of the Commission’s International Bureau to discuss the FCC’s two-degree spacing policy under consideration in the above-referenced proceeding.

Intelsat reiterated that the two-degree spacing policy should be eliminated or, at a minimum, should not be applied to new bands. In addition, Intelsat discussed its position that the Commission should retain existing power levels if the two-degree spacing policy is preserved, and noted that increasing the power levels would not have a positive net effect. Intelsat handed out the attached slides to illustrate the potential harmful effect on previously coordinated, existing operations of applying the two-degree spacing rules, and noted that that harmful effect would be exacerbated if the rules were retained with higher power levels.

Please contact the undersigned with any questions.

Sincerely,

/s/ Jennifer D. Hindin  

Jennifer D. Hindin  
Counsel for Intelsat
cc: Jose Albuquerque
    Kerry Murray
    Clay DeCell
    Diane Garfield
    Stephen Duall
    Chip Fleming
2° Rule Issue Example
Issue: The Past

A: Coordination Agreement
   Mutual DL EIRPD = -23 dBW/Hz

B: Coordination Agreement
   Mutual DL EIRPD = -23 dBW/Hz

C: Traffic managed to avoid harmful RFI
   
X-2° Permitted List Satellite
Non-US Filing Country 1

X° Permitted List Satellite
Non-US Filing Country 2

X+2° US Licensed Satellite
US Filing

INTELSAT
Issue: The Past

A: Coordination Agreement
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C: Traffic managed to avoid harmful RFI

X-2°
Permitted List Satellite
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US Filing
Issue: The Present

Satellite B traffic impacted by:
- Satellite B reduction to -26 dBW/Hz
- Satellite D operations at -23 dBW/Hz without coordination of traffic

Coordination Agreement
Mutual DL EIRPD = -23 dBW/Hz

NO AGREEMENT
2° rules require both at -26 dBW/Hz

X-2°
Permitted List Satellite
Non-US Filing Country 1

X°
Permitted List Satellite
Non-US Filing Country 2

X+2°
US Licensed Satellite
Non-US Filing Country 1