October 23, 2015

FILED ELECTRONICALLY

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


Dear Ms. Dortch:

Representatives of SES met to discuss the above-referenced rulemaking proceeding regarding reform of the Commission’s Part 25 rules on October 21, 2015 with Diane Cornell, Special Counsel to Chairman Wheeler, and on October 22, 2015 with members of the International Bureau: Mindel De La Torre, Chief; Robert Nelson, Chief Engineer; Jose Albuquerque, Satellite Division Chief; and Chip Fleming, Satellite Division Chief Engineer. The SES representatives present at both meetings were: Karim Michel Sabbagh, President & CEO; Nancy J. Eskenazi, Vice President Legal Services, Global Regulatory; and Kimberly Baum, Vice President, Spectrum Management & Development Americas. Gerald E. Oberst, Senior Vice President, Global Regulatory & Governmental Strategy, was present for the October 21 meeting only. The discussion focused on the matters covered in the attached talking points.

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Karis A. Hastings

Karis A. Hastings
Counsel for SES
karis@satcomlaw.com

Attachment

cc: Diane Cornell
    Mindel De La Torre
    Robert Nelson
    Jose Albuquerque
    Chip Fleming
Two degree spacing

- Two degree spacing facilitates new entry by providing a predictable baseline at which parties can operate prior to completing coordination with their neighbors.

- Absent the two degree spacing framework, new entry could be blocked by incumbents indefinitely based on conservative ITU coordination criteria.

- Because Intelsat’s ITU filings are among the oldest in the world and large in number, relying on ITU priority instead of two degree spacing would benefit Intelsat at the expense of all other operators but particularly new entrants and new satellites.

- Equally concerning are the Satellite Division’s ideas to afford special protection to incumbents who claim to have small earth stations in operation and also to preventing new entrants from having certainty of operation even at the minimum two degree spacing levels.

  - This approach has the same effect as removing the FCC’s two degree spacing policy altogether.

- Instead of pursuing approaches that would either directly or effectively do away with two degree spacing, the FCC should maintain its current two degree spacing policy as a critical means to facilitate and encourage competition in the US market and to protect the public interest.

- We recommend that the FCC increase the two degree spacing operating levels to more realistically and accurately correspond with those of modern satellite systems.