September 15, 2015

FILED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

Re: Ex Parte Notification
Comprehensive Review of Licensing and Operating Rules
For Satellite Services
IB Docket No. 12-267

Dear Ms. Dortch:

On September 11, 2015, Bruce Rothaar and Tim Marshall of Kymeta Corporation and I spoke by telephone with the following International Bureau Satellite Division staff: Jose Albuquerque, Chief, Chip Fleming, Chief Engineer, Clay DeCell, Engineering Division and Diane Garfield, Policy Division.

Consistent with previously filed Comments (filed by Kymeta), Reply Comments (filed by SIA) and ex parte filings (filed by SIA), Kymeta urged the FCC to modify the off-axis EIRP density mask for conventional GSO Ka-band antennas and conventional GSO Ku-band antennas by removing the “wings” that begin at 19.1° and end abruptly at 48°. Kymeta and SIA independently calculated, and submitted, worst-case analyses (factoring in the allowed exceedance) which demonstrated that eliminating the “wings” would increase interference by a maximum of 0.20 dB or 0.19 dB respectively – a level that is not material.

Kymeta emphasized that the Kymeta/SIA proposal seeks to eliminate the wings in the off-axis mask for both Ka-band and Ku-band antennas. Specifically, the Kymeta/SIA proposal seeks to modify the off-axis mask in the following rule sections:

- Ka-Band: Section 25.138(a)(1) and (2).
- Ku-Band: Sections 25.218(e)(1) and (2); 25.218(f)(1) and (2); 25.222 (Ku-band ESVs); 25.226 (Ku-band VMESs); and 25.227 (Ku-band ESAAs).

Kymeta and SIA do not propose to remove the “wings” from the off-axis mask in Section 25.209.
Please contact the undersigned if you have any questions.

Respectfully submitted,

Robert S. Koppel
Counsel to Kymeta Corporation

cc (via e-mail):
Jose Albuquerque
Chip Fleming
Clay DeCell
Diane Garfield