August 5, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re:  Ex Parte Notification
Higher Ground LLC
Blanket License Application for C-band Mobile Earth Terminals
IBFS File No. SES-LIC-20150616-00357

Dear Ms. Dortch:

On August 3, 2016, Higher Ground CEO Rob Reis and the undersigned met with members of the International Bureau’s Satellite Division and Wireless Telecommunications Bureau’s Broadband Division regarding the above-captioned application (see Attachment for a list of attendees).

Higher Ground responded to several questions from staff. Higher Ground confirmed that its SatPaqs would re-coordinate, i.e., engage the Channel Master software to identify a non-interfering frequency, prior to transmission where a SatPaq’s location changes from a previous self-coordination by one second of arc in latitude or longitude, consistent with Section 25.118(a)(1)(iii) of the Commission’s rules (revised Section 25.118(a)(4)(vi)).

Higher Ground also confirmed that it will have a designated point of contact available to the extent any C-band point-to-point microwave operator believes it has experienced interference that could be the result of SatPaq operations. Upon receipt of any interference complaint (including details regarding the location, time, operating frequency, and nature of the reported incident), Higher Ground will conduct a review to determine whether SatPaq operations could be the source of interference. In addition, Higher Ground again noted that it will make available to the Commission a log of all SatPaq transmissions over a specified period upon request, subject to appropriate confidentiality.
Higher Ground recounted that OET granted experimental authorization to test SatPaq operations in 2014, and since then has modified and renewed that authorization. Higher Ground may operate SatPaqs under experimental authority in eight areas across the United States, provided that it notifies nearby point-to-point microwave operators of its presence. Higher Ground hired a frequency coordinator to ensure proper notice. Higher Ground has engaged in roughly 15,000 transmissions, from mountainous areas to major metropolitan areas. Higher Ground’s experimental testing continues, and there has not been a single report of interference to date.

Higher Ground also discussed commercial introduction of the SatPaq product. In response to a question, Higher Ground expressed the view that it can abide by a measured rollout in the first year of operation – for example, 5,000 units per quarter – if necessary. Higher Ground will update Commission staff on its SatPaq deployment within the first year of licensing.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Adam D. Krinsky
Adam D. Krinsky

Attachment

cc: Jose Albuquerque
   Kerry Murray
   Chip Fleming
   Paul Blais
   Cindy Spiers
   Hsing Liu
   Blaise Scinto
   Steve Buenzow
   Cheng Liu, FWCC
   Tiffany West Smink, CenturyLink
   Susan Crandall, Intelsat
   David Meyer, NSMA
Jose Albuquerque
Kerry Murray
Chip Fleming
Paul Blais
Cindy Spiers
Hsing Liu
Blaise Scinto
Steve Buenzow