

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters, IB Docket No. 16-408, Report and Order and Further Notice of Proposed Rulemaking.*

I am supportive of today's order setting forth the technical rules for next-generation non-geostationary-satellite orbit (NGSO) fixed systems. Hopefully, our decision will provide applicants with the needed certainty to further explore and invest in these new constellations. These NGSO systems bring the promise of high speeds and low latency, which ultimately may bring gigabit broadband to all, including remote areas, but several are ambitious undertakings involving hundreds and thousands of small satellites.

What has become apparent is that satellite operators have designed very different orbital systems. This poses quite the challenge for the Commission, as the satellite industry is not in agreement on some of the issues decided in this item. For instance, there is real concern over how the potential for in-line interference should be handled. While the hope is that operators will enter into coordination agreements, if this does not occur, the Commission has adopted a default sharing mechanism that some entities seem to support, some support with some modifications, while still others articulate quite convincingly that it won't work at all. I'm not so sure those internally believe it would work as planned if actually triggered. This scheme may need to be revisited on reconsideration or, potentially, in the future when these systems are more mature. Some also question whether there are sufficient launch capabilities to get all of these satellites into orbit in time to meet the performance benchmarks. This is also something worth monitoring and waivers may, or may not, be necessary in the future.

Ultimately, we may need to see how these systems develop and how many come to fruition and, based on the actual systems deployed, rule tweaks may be necessary. I think we all know that twelve NGSO systems – and this does not include the V-band constellations – are unlikely. For the time being, we have done our best to provide the necessary framework and environment for investment. I wish the satellite industry the best of luck and look forward to seeing this engineering feat come to reality.