



February 19, 2026

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: *Satellite Spectrum Abundance*, **SB Docket No. 25-180**
Modernizing Spectrum Sharing for Satellite Broadband, **SB Docket No. 25-157**
Space Modernization for the 21st Century, **SB Docket No. 25-306**

Dear Ms. Dortch:

Michael Calabrese, representing New America's Open Technology Institute (OTI), and Kristian Stout, representing the International Center for Law & Economics (ICLE), spoke via Zoom on February 19 with Jay Schwarz, Chief of the Space Bureau, with respect to the above-captioned proceeding.

We discussed the report of the LEO Satellite Policy Working Group that we jointly convened throughout 2025,¹ noting its ongoing relevance to a wide variety of work at the Space Bureau and encouraging staff to rely on it as a resource in the above-captioned and related proceedings. We expressed our view that the Working Group's recommendations are well aligned with the goals of the above-captioned proceeding and encouraged the Commission to continue its efforts to establish a regulatory framework that will allow the nascent satellite-broadband industry to thrive.

We discussed the relevance of the Working Group's recommendations to the Commission's pending EPFD proceeding, particularly in relation to WRC-27. We also discussed WRC-27 Agenda Item 1.5, which will consider regulatory measures to limit unauthorized

¹ See *Low Earth Orbit Satellites: Policies to Promote Spectrum Sharing, Foster Competition, and Close Digital Divides*, LEO POLICY WORKING GROUP, INT'L CTR. FOR LAW & ECON. & NEW AMERICA (Oct. 30, 2025) [hereinafter *LEO Working Group Report*], <https://www.newamerica.org/oti/wireless-future-project/reports/leo-satellites>.

operations of non-geostationary-satellite-orbit earth stations in the fixed-satellite and mobile-satellite services, in accordance with Resolution 14 (WRC-23), and Agenda Item 1.7, which will consider studies on sharing and compatibility and develop technical conditions for the use of International Mobile Telecommunications in the frequency bands 4,400–4,800 MHz and 7,125–8,400 MHz (or parts thereof) and 14.8–15.35 GHz, taking into account existing primary services operating in these and adjacent frequency bands, in accordance with Resolution 256 (WRC-23).

Finally, we noted that spectrum policy will continue to be a significant area of focus and expressed our general support for the Commission’s spectrum-abundance agenda.

Pursuant to 47 C.F.R. § 1.1206(b), this letter is being filed with your office.

Respectfully submitted,

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/s/ Kristian Stout
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cc: Jay Schwarz