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January 22, 2009

**SUBMITTED ELECTRONICALLY**

Mr. James Burtle  
Chief, Experimental Licensing Branch  
Office of Engineering and Technology  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Ref. #7610 - Application of Bigelow Aerospace, LLC for  
Experimental License (OET File No. 0398-EX-PL-2008)**

Dear Mr. Burtle:

This letter is written on behalf of Bigelow Aerospace, LLC (“Bigelow Aerospace”) in further response to the October 17, 2008 correspondence from Leann Nguyen requesting additional information concerning the above-referenced application. In particular, the Experimental Licensing Branch (“Branch”) is seeking a demonstration, consistent with the requirements of the International Bureau and Part 25 of the Commission’s Rules, that the proposed operation will not cause harmful interference to geostationary orbit satellite (“GSO”) networks operating in the Ku-band. The Branch originally requested that Bigelow Aerospace provide such a showing within thirty days from the date of the email request.

On November 12, 2008 and again on December 15, 2008, Bigelow Aerospace sought additional thirty (30) day periods within which to provide the requested demonstration. Bigelow Aerospace cited the complex interference showing required under Sections 25.146 and 25.208 of the Commission’s Rules, and noted that it required additional time to complete the study. Because Bigelow Aerospace is seeking to employ the Ku-band spectrum on an experimental basis, and not for the type of commercial service anticipated for applicants under Section 25.146 of the Commission’s Rules, it is seeking to provide the information that the Branch has requested without engaging outside technical consultants. As a result, preparation of the required showing must be undertaken by Bigelow Aerospace’s engineering staff in



addition to their current operational duties. For this reason, Bigelow Aerospace has not yet completed a full interference showing pursuant to Section 25.208. Nonetheless, considerable time and effort has been put into preparing and analyzing the necessary data. Bigelow is hopeful that no further extensions will be necessary, and requests an additional thirty-five days from the previous deadline to provide the complete showing requested.

Accordingly, for the reasons outlined herein and in its prior letters, Bigelow Aerospace respectfully requests additional time within which to prepare a complete response to the Branch's October 17, 2008 request, and asks that it be permitted to file its response **on or before February 21, 2009**.

Should there be any questions concerning this request, please contact the undersigned counsel.

Respectfully submitted,

*s/ David S. Keir*

David S. Keir

*Counsel to Bigelow Aerospace, LLC*

cc: Ms. Leann Nguyen, OET\*  
Mike Gold, Bigelow Aerospace\*  
Peter Blouke, Bigelow Aerospace\*

\* = via email