



DAVID S. KEIR
202.416.6742
dkeir@lermansenter.com

February 19, 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.

Bigelow Aerospace has since sought additional time within which to provide the interference analysis requested by the Bureau, citing the complex showing required under Sections 25.146 and 25.208 of the Commission’s Rules, and noting that it required additional time within which to complete such a study. The most recent such request sought permission to file no later than February 21, 2009.

As it has previously noted, 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. Preparation of the required showing has been undertaken by Bigelow Aerospace's engineering staff in addition to their other duties. Considerable time and effort has been put into preparing and analyzing the necessary data, and Bigelow Aerospace is moving closer to completing the required showing specified under Section 25.208. Nonetheless, additional time is needed to finalize this analysis and draft the necessary explanatory text to present it to the Branch. For this reason, and in an effort to avoid further duplicative extension requests, Bigelow Aerospace estimates that it will likely need another eight weeks to complete its detailed response, and therefore seeks an additional sixty (60) days from the current deadline to provide the complete and final showing requested.

Accordingly, for the reasons outlined herein, Bigelow Aerospace respectfully requests additional time within which to prepare a complete response to the Branch's request for additional, and asks that it be permitted to file its response **on or before Wednesday, April 22, 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