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Via Electronic Filing (IBFS)

Mindel De La Torre
Bureau Chief, International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: 115 License Subsidiary, LLC
Call Sign 2700
Request for Prompt Action on Milestone Compliance Determination

Dear Ms. De La Torre:

115 License Subsidiary, LLC (the “Company”), by its counsel, hereby requests that the International Bureau (“Bureau”) take prompt action in reviewing the Company’s compliance with its requirement to execute a binding, non-contingent satellite construction contract for a 17/24 GHz Broadcasting-Satellite Service satellite at the 115°W.L. orbital location. The Company provided a complete copy of its satellite construction contract to the Bureau in December of last year. Over four months ago, the Company submitted a letter from the satellite manufacturer, Space Systems/Loral, Inc., providing further evidence that the Company timely met its initial milestone requirement. Further, over two months ago, the Company requested the Bureau to take prompt action regarding this same issue. However, the Bureau still has not taken any action.

The Bureau’s delay is inexplicable. A survey of the time it has taken the Bureau to review other satellite contracts shows that since 2006 the International Bureau has taken on average only 5.6 months to make a milestone compliance determination. It has now been over eight months, and the Company’s inquiries to the Bureau regarding the status of its contract review suggest that it is not near completion.

The Company urges the Bureau to remedy this administrative delay promptly. The delay is not without real world repercussions. The Bureau's protracted milestone compliance assessment creates regulatory uncertainty. Additionally, such delay creates unnecessary costs to the Company and ties up funds that could be used for satellite construction or other business purposes. While the Company appreciates the Bureau's need for time to make informed milestone determinations, that need must be balanced against the licensee's business interests. For these reasons, the Company respectfully urges the Bureau to take prompt action in reviewing the Company's compliance with its requirement to execute a binding, non-contingent satellite construction contract.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/

Bruce D. Jacobs
Tony Lin
Counsel to 115 License Subsidiary, LLC

cc: Robert Nelson
Andrea Kelly