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April 14, 2017

Mr. Jose Albuquerque
Chief
Satellite Division, International Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: O3b Limited Request for Extension of Time for Response
IBFS File No. SAT-AMD-20161115-00116 (Call Sign S2935)

Dear Mr. Albuquerque,

O3b Limited (“O3b”) respectfully requests that the Commission extend by thirty days, to May 20, 2017, the deadline for O3b’s response to the Commission’s March 21, 2017 letter requesting additional information regarding the above-referenced O3b amendment. The O3b amendment seeks U.S. market access for 24 satellites operating in circular equatorial orbit (O3bN) and 16 satellites operating in inclined orbit (O3bI) using previously authorized frequencies, and also requests additional frequency bands.

O3b understands that the Commission does not routinely grant extensions,¹ but the facts in this instance justify allowing O3b more time to respond to the Commission. The FCC has requested additional information regarding several aspects of the O3b amendment, including the EPFD analysis O3b submitted in support of its application. Preparing a showing to demonstrate O3b’s compliance with the EPFD limits of Article 22 of the ITU Radio Regulations is a complex and time-consuming task.

Further, O3b intends to use alternative methods and software to demonstrate compliance with applicable EPFD limits. If granted this brief extension and by using alternative software, O3b will be able to provide a more thorough and comprehensive response to the Commission’s requests for information.

Grant of the requested extension is consistent with precedent and will not prejudice other parties in the ongoing Ku/Ka-band processing round. The Commission has already given another

¹ See C.F.R § 1.46(a).

applicant in the processing round an additional thirty days to respond to Commission questions.² As a result, deferring the deadline for the O3b response will not affect the timetable for the processing round as a whole.

For the foregoing reason, O3b respectfully requests a thirty-day extension of the deadline for O3b to file its response to the Commission's March 21, 2017 letter.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne Malloy".

Suzanne Malloy
VP, Regulatory Affairs
O3b LIMITED

² LeoSat MA, Inc., IBFS File No. SAT-LOI-20161115-00112 (Call Sign S2979). On April 10, 2017, the FCC granted LeoSat a thirty-day extension to respond to the FCC's request for additional information, including a request to submit supplemental information on LeoSat's EPFD analysis.