

June 21, 2017

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Motion for Extension of Time

IBFS File Nos. SAT-LOI-20160428-00041, SAT-PDR-20161115-00108, SAT-LOA-20161115-00109, SAT-PDR-20161115-00111, SAT-PDR-20161115-00112, SAT-LOA-20161115-00113, SAT-AMD-20161115-00116, SAT-LOA-20161115-00117, SAT-LOA-20161115-00118, SAT-PDR-20161115-00120, and SAT-LOA-20161115-00121

Dear Ms. Dortch:

Ten companies have submitted applications or petitions for operations for Non-Geostationary Orbit-like fixed satellite service in the 12.75-13.25 GHz, 13.85-14.0 GHz, 18.6-18.8 GHz, 19.3-20.2 GHz, and 29.1-29.5 GHz bands that the FCC recently accepted for filing.¹ Karousel LLC (Karousel), Space Exploration Holdings, LLC (SpaceX) and ViaSat Inc. (ViaSat) respectfully request a brief extension of the deadlines for (i) responses to comments and oppositions to petitions to deny and (ii) replies to oppositions.² Counsel for Audacy Corporation, The Boeing Company, LeoSat MA, Inc., O3b Limited, Space Norway AS, Telesat Canada, Theia Holdings A, Inc., and WorldVu Satellites Limited d/b/a OneWeb have each represented that they do not object to the extensions of time proposed below.

¹ See *Satellite Policy Branch Information; Applications Accepted for Filing; Cut-Off Established for Additional NGSO-Like Satellite Applications or Petitions for Operations in the 12.75-13.25 GHz, 13.85-14.0 GHz, 18.6-18.8 GHz, 19.3-20.2 GHz, and 29.1-29.5 GHz Bands*, Public Notice, DA 17-524 (rel. May 26, 2017) (“NGSO FSS Applications Public Notice”); see also *OneWeb Petition Accepted for Filing; Cut-Off Established for Additional NGSO-Like Satellite Applications or Petitions in the 10.7-12.7 GHz, 14.0-14.5 GHz, 17.8-18.6 GHz, 18.8-19.3 GHz, 27.5-28.35 GHz, 28.35-29.1 GHz, and 29.5-30.0 GHz Bands*, Public Notice, 31 FCC Rcd 7666 (IB July 15, 2016).

² See NGSO Applications Public Notice at 4.

Although extensions of time are not routinely granted,³ good cause exists to grant this request. The NGSO-like FSS applications in the current processing round involve highly technical orbital mechanics and complex issues of radiofrequency interference. The parties will require time to analyze comments and petitions and prepare written responses. The current pleading cycle, however, provides interested parties 11 calendar days to file responses and oppositions to comments and petitions to deny. This period includes the Federal Independence Day holiday of Tuesday, July 4, 2017.⁴

The FCC has previously granted extensions of time to allow parties to review and fully respond to a complex record.⁵ The FCC has also granted extensions of time to adjust for holidays that occur during a pleading cycle.⁶ In this case, the benefits of providing interested parties with adequate time to review the record and develop well informed responses far outweigh the burden that may result from granting a short extension of the comment cycle. Karousel, SpaceX and ViaSat therefore respectfully request the FCC extend the deadline for submitting responses to comments and oppositions to petitions by seven days, from Friday, July 7, 2017 to Friday, July 14, 2017, and extend the deadline for submitting replies to oppositions from Friday, July 14, 2017 to Wednesday, July 26, 2017.

³ See 47 C.F.R. § 1.46(a).

⁴ See NGSO FSS Applications Public Notice at 4.

⁵ See e.g., *Streamlining Deployment of Small Cell Infrastructure by Improving Wireless Facilities Siting Policies*, Order, 32 FCC Rcd 335, 336 ¶ 3 (WTB Jan. 12, 2017) (“[W]e agree that a brief extension of the filing deadline will allow parties to provide the Commission with more thorough comments that will facilitate the compilation of a complete record, without causing undue delay to the Commission’s consideration of these issues.”); *Amendment of Parts 0, 1, 2, 15 and 18 of the Commission’s Rules Regarding Authorization of Radiofrequency Equipment*, Order, 30 FCC Rcd 8498, 8499 ¶ 3 (OET Aug. 25, 2015) (“[W]e believe that extensions of the comment and reply comment deadlines will provide parties with an opportunity to more fully analyze and respond to the complex technical issues raised . . . , thus allowing development of a more complete record in these proceedings”).

⁶ See e.g., *Promoting the Availability of Diverse and Independent Sources of Video Programming*, Order, 31 FCC Rcd 13267 (MB Dec. 19, 2016) (granting an extension based (in part) on the comment deadline occurring on the first business day after a federal holiday and the time period separating the comment and reply comment deadlines encompassing two federal holidays).

Please contact us with any questions regarding this submission.

Respectfully submitted,

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