

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
THE BOEING COMPANY	)	Call Sign: S2993
	)	
Application for Authority	)	File Nos. SAT-LOA-20170301-00028,
to Launch and Operate a	)	SAT-AMD-20170929-00137 &
Non-Geostationary Satellite Orbit	)	SAT-AMD-20180131-00013
System in the Fixed Satellite Service	)	

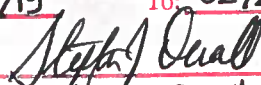
REQUEST FOR EXTENSION

The Boeing Company ("Boeing"), pursuant to Section 1.46 of the Commission's rules, herein requests an extension of time, until February 22, 2019, for it to respond to the Petition to Dismiss or Defer ("Petition") that was filed by Hughes Network Systems, LLC ("Hughes") on January 29, 2019 in the above referenced proceeding. Boeing requests this extension so that it may file a consolidated response in a single document to all petitions and comments that are filed addressing Boeing's application. The practical effect of this request would be to extend by just nine days the deadline for Boeing to respond to Hughes' Petition.¹ For the reasons discussed herein, such a brief extension is clearly warranted and would serve the public interest.

Boeing recognizes that it is the Commission's policy that extensions of filing deadlines shall not be routinely granted.² The circumstances leading up to this extension

¹ Section 25.154(c) indicates that Boeing must file its opposition within 10 days of the date that Hughes filed its Petition, resulting in a filing deadline of February 8, 2019. Section 1.4(h) extends this deadline by three business days because Hughes served Boeing by mail, resulting in an existing deadline of February 13, 2019. Thus, Boeing is requesting a nine day extension until February 22, 2019.

² 47 C.F.R. § 1.46(a).

 GRANTED International Bureau	File #	SAT-LOA-20170301-00028 SAT-AMD-20170929-00137 SAT-AMD-20180131-00013
	Call Sign	S2993
	Grant Date	02/05/19
	Term Dates	From 02/13/19 To 02/22/19
	Approved:	 Stephen J. Duall Chief, Satellite Policy Branch

*Extension of time to respond only

request, however, were anything but routine. The Commission placed Boeing's application on public notice for comment on December 14, 2018.³ As a result of the federal government shutdown, however, the deadline for comments on Boeing's application was initially delayed until the day following the reopening of the government, which was January 30, 2019.⁴ The Commission subsequently established new filing deadlines for materials that were required to be filed with the Commission during the shutdown, effectively extending the deadline for comments and petitions on Boeing's application until February 8, 2019.⁵

Boeing is aware that other parties intend to file comments or petitions addressing the substance of Boeing's application.⁶ It would be burdensome and administratively inefficient, both for Boeing and for the Commission, to require Boeing to file multiple sets of pleadings in response to the Hughes's Petition and also in response to other petitions and comments that are filed on February 8th. It would also be unfair to Boeing to require it to respond in a public filing to the Hughes Petition before Boeing has had a sufficient opportunity to review and consider the comments and petitions that are filed by other parties. Based on the comments and petitions that have been filed on other applications for

³ See *Public Notice*, Satellite Policy Branch Information, Space Station Applications Accepted for Filing, Report No. SAT-01364 (Dec. 14, 2018).

⁴ See *Public Notice*, Impact of Potential Lapse in Funding on Commission Operations, DA 19-10 (Jan. 2, 2019).

⁵ See *Public Notice*, Revisions to Filing and Other Deadlines Following Resumption of Normal Commission Operations, DA 19-26 (Jan. 29, 2019).

⁶ For example, the undersigned received a telephone call on January 10, 2019 from a representative of SES/O3b during which it was indicated that they were planning to file comments on Boeing's application.

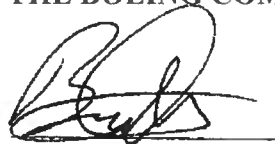
non-geostationary satellite orbit (“NGSO”) satellite systems, Boeing anticipates that many of the arguments that are likely be made by various parties will be similar or closely related to each other. It would be much more efficient and equitable to permit Boeing to address all of these arguments in a single consolidated filing.

As noted above, the deadline for the filing of comments and petitions on the Boeing application is currently set for February 8, 2019. Section 25.154(c) provides that Boeing will then have 10 days to file its response to those comments and petitions. Section 1.4(h) extends this deadline by three business days if the comments and petitions are served on Boeing by mail,⁷ which has become the customary practice within the satellite communications legal bar. Therefore, the anticipated deadline for Boeing’s response to the other comments and petitions will be February 22, 2019. Given this, the public interest would be served by granting Boeing an extension until that date for the filing of its opposition to the Hughes Petition.

Respectfully submitted,

THE BOEING COMPANY

By:



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Its Attorneys

February 1, 2019

⁷ For purposes of identifying the three business days covered by this rule, Monday, February 18, 2019 is a federal government holiday.

CERTIFICATE OF SERVICE

I, Bruce A. Olcott, hereby certify that a copy of the foregoing Request for Extension was served this 1st day of February 2019, via first-class mail, postage prepaid thereon to the following:

Jennifer A. Manner
Senior Vice President, Regulatory Affairs
11717 Exploration Lane
Germantown, MD 20876


Bruce A. Olcott