

Hogan Lovells US LLP Columbia Square 555 Thirteenth Street, NW Washington, DC 20004 T +1 202 637 5600 F +1 202 637 5910 www.hoganlovells.com

January 12, 2018

## VIA IBFS

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

Re: Astro Digital US, Inc. License Requirement Showing Extension Request File No. SAT-LOA-20170508-00071, Call Sign S3014

Dear Mr. Albuquerque:

Astro Digital US, Inc. ("Astro Digital") requests a thirty-day extension until February 12, 2018 to submit a showing indicating how the company's operations in the 29.9-30.0 GHz band will comply with the non-interference requirement specified in paragraph 4 of Astro Digital's license grant.<sup>1</sup> The engineering analysis involved in providing this analysis is complex, and the thirty-day period to provide this information overlaps with two major holidays. Accordingly, Astro Digital submits that a thirty-day extension of time to provide this information is warranted.

Grant of this modest extension request would not adversely impact any entities. The Astro Digital satellite authorized in the license grant is a "Phase 1" satellite, which does not operate in the 29.9-30.0 GHz band, and accordingly, the Astro Digital system could not interfere with other systems operating in that band. Moreover, Astro Digital does not expect to deploy its Phase 2 satellites operating in the 29.9-30.0 GHz band until the third quarter of 2018.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> See Stamp Grant, at ¶¶ 4-5, File No. SAT-LOA-20170508-00071 (granted December 14, 2017, as corrected).

<sup>&</sup>lt;sup>2</sup> Moreover, none of the commercial constellations identified in the Astro Digital license grant and proposing to operate in the 29.9-30.0 GHz band are currently operational. See *id.* at ¶ 4 (citing Public Notice, Satellite Branch Policy Information, OneWeb Petition Accepted for Filing IBFS File No. SAT-LOI-20160428-00041 Cut-Off Established for Additional NGSO-like Satellite Applications or Petitions for Operations in the 107-12.7 GHz, 14.0-14.5 GHz, 17.8-18.6 GHz, 18.8-19.3 GH, 27.5-28.35 GHz, 28.35-29.1 GHz, and 29.5-30.0 GHz Bands, 31 FCC Rcd 7666 (July 15, 2016)).

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For these reasons, Astro Digital submits that a thirty-day extension of time to submit the noninterference showing is justified.<sup>3</sup> Please contact the undersigned if you have any questions regarding this letter.

Respectfully submitted,

<u>/s/ Tony Lin</u>

Tony Lin tony.lin@hoganlovells.com D 1+ 202 637 8452

cc: (via email) Stephen Duall

<sup>&</sup>lt;sup>3</sup> See, e.g., Stamp Grant, Planet Labs, Request for Extension of Time, File No. SAT-MOD-20140321-0032 (granted August 11, 2014); Stamp Grant, New Skies Satellites B.V., Request for Extension of Time, File No. SAT-PPL-20110620-00112 (granted April 4, 2012).