

February 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 an additional thirty-day extension until March 14, 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.¹ Astro Digital has been working diligently on the showing, including reaching out to relevant operators, such as Kongsberg Satellite Services (“KSAT”), and reviewing applicable FCC filings. However, the engineering analysis involved in the showing has been more complex than anticipated.

Additionally, as Astro Digital has explained, grant of an 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. 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 2018.²

¹ See Stamp Grant, at ¶¶ 4-5, File No. SAT-LOA-20170508-00071 (granted December 14, 2017, as corrected); see also Stamp Grant, File No. SAT-LOA-20170508-00071 (granting request to extend the deadline to provide compliance showing) (granted January 18, 2018).

² 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 GHz, 27.5-28.35 GHz, 28.35-29.1 GHz, and 29.5-30.0 GHz Bands*, 31 FCC Rcd 7666 (July 15, 2016)).

For these reasons, Astro Digital submits that an additional thirty-day extension of time to submit the non-interference showing is justified.³ Please contact the undersigned if you have any questions regarding this letter.

Respectfully submitted,

/s/ Tony Lin

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

cc: (via email)
Stephen Duall

³ 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).