

SheppardMullin

Sheppard, Mullin, Richter & Hampton LLP
2099 Pennsylvania Avenue, NW, Suite 100
Washington, D.C. 20006-6801
202.747.1900 main
202.747.1901 fax
www.sheppardmullin.com

Brian D. Weimer
202.747.1930 direct
bweimer@sheppardmullin.com


August 7, 2018

File Number: 48HH-268121

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**** EXTENSION OF TIME TO FILE PLEADINGS ****
SAT-MOD-20180319-00022
File # SAT-AMD-20180104-00004

	S2363		
Call Sign	S2994	Grant Date	08/09/18
(or other identifier)		Term Dates	08/27/18
From		To:	09/12/18
GRANTED*		Approved:	<i>Steph J Duall</i>
International Bureau			

Re: **Petition for Extension of Time**
IBFS File No. SAT-MOD-20180319-00022, Call Sign S2963 & File No. SAT-AMD-
20180104-00004, Call Sign S2994

** see attachment to grant **

Dear Ms. Dortch:

As a result of pervasive technical issues experienced by users of the Commission's International Bureau Filing System ("IBFS"), WorldVu Satellites Limited ("OneWeb") respectfully requests a brief extension of time to file a responsive pleading or pleadings to all Comments or Petitions recently filed by third parties regarding the above-referenced applications until August 27, 2018.¹ For the reasons set forth herein, grant of the extension is in the public interest.

On July 30, 2018, comments and petitions were due in response to the above-referenced modification application filed by OneWeb (the "March 2018 filing").² As a result of technical issues related to IBFS, only the Comments filed by Space Exploration Holdings, LLC are reflected in IBFS as timely filed. Moreover, on August 6, 2018, comments and petitions were due in response to the above-referenced amendment to pending application filed by OneWeb (the "January 2018 filing"). Problems related to IBFS have continued to plague OneWeb's ability to respond even with respect to OneWeb's January 2018 filing. For example, on August 3, 2018, the undersigned received via U.S. mail a service copy of Comments filed by The Boeing Company ("Boeing Comments"). The Boeing Comments explicitly relate to both the January and March 2018 filings. Yet, as of this afternoon, the Boeing Comments are still not reflected in IBFS.

¹ See 47 C.F.R. § 25.154(c).

² See Satellite Policy Branch Information, *Space Station Applications Accepted for Filing*, Public Notice, Report No. SAT-01325, at 2 (IB 2018); see also 47 C.F.R. § 25.154(a)(2).

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OneWeb acknowledges that extension requests are not routinely granted by the Commission.³ However, the Commission has consistently granted extensions of time where malfunctioning electronic filing systems have created administrative burdens for parties.⁴ Here, the ongoing technical issues associated with IBFS have resulted in uncertainty and delay as OneWeb has worked to confirm that it has actually received all responsive pleadings filed to date, or that pleadings with which it was served were in fact properly filed with the Commission. This dynamic has resulted in delays impacting OneWeb's ability to substantively review the record and develop appropriate legal and technical responses to the arguments raised in this proceeding within the required timeframe to file a responsive pleading.

Therefore, OneWeb respectfully requests an extension of the deadline to file its Opposition and Response to Comments related to both OneWeb's March 2018 filing and its January 2018 filing until August 27, 2018.⁵

Please contact the undersigned with any questions regarding this submission.

Very truly yours,

/s/ Brian D. Weimer

Brian D. Weimer
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Cc: Jose Albuquerque (Satellite Division)
Stephen Duall (Satellite Division)

³ 47 C.F.R. § 1.46(a).

⁴ See e.g., *Media Bureau Extends Deadline for MVPDs to File EEO Program Annual Reports (FCC Form 396-C) to October 16, 2017, and Identifies Those That Must Respond to Supplementary Investigation Questions*, Public Notice, 32 FCC Rcd 6930 (MB 2017) (extending deadline due to technical difficulties); *Non-ECFS Filing Deadlines Extended Due to Unavailability of FCC Systems*, Public Notice, 30 FCC Rcd 9872 (2017) (extending deadline so as to not penalize parties "for the technical inability to make required filings during the time that the Commission's online systems are not available"); *In the Matter of Bell Atlantic Progress Report on Compliance With Bell Atlantic/NYNEX Merger Order Conditions*, 14 FCC Rcd 4403 (1999) (extending deadlines where technical difficulties resulted in comments being not readily available to the public until after the comment filing date).

⁵ See 47 C.F.R. § 25.154(c).

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William Wiltshire (Counsel to SpaceX)
Karis Hastings (Counsel to SES Americom, Inc. and O3b Limited)
Bruce Olcott (Counsel to The Boeing Company)
Edward Yorkgitis (Counsel to Elefante Group)
Scott Harris (Counsel to Iridium Constellation, LLC)

**Attachment to Grant
WorldVu Satellites Limited
Petition for Extension of Time
August 9, 2018**

IBFS File Nos. SAT-MOD-20180319-00022 & SAT-AMD- 20180104-00004

The Satellite Division grants the petition filed by WorldVu Satellites Limited (OneWeb) to extend the time to file responsive pleadings to comments and petitions regarding the above-captioned applications.

OneWeb's application in IBFS File No. SAT-MOD-20180319-00022 was accepted for filing on June 29, 2018. Public Notice, Satellite Policy Branch Information: Space Station Applications Accepted for Filing, Report No. SAT-01325. Oppositions and other pleadings were due on July 30, 2018. OneWeb's application in IBFS File No. SAT-AMD-20180104-00004 was accepted for filing on July 6, 2018. Public Notice, Satellite Policy Branch Information: Space Station Applications Accepted for Filing, Report No. SAT-01327. Oppositions and other pleadings were due on August 6, 2018.

Commencing on July 30, 2018, technical difficulties with the International Bureau's Filing System (IBFS) hindered the electronic filing of pleadings in response to OneWeb's application and prevented OneWeb and other parties from viewing pleadings that were filed. These technical difficulties were resolved by August 8, 2018, but in the interim they hindered or prevented OneWeb and other parties to ascertain the nature and content of pleadings that had been filed in connection with the two applications.

The Division finds that the technical difficulties with IBFS, as well as the complexity of the issues raised by pleadings, justify an extension of time to file oppositions to petitions to deny or responses to comments under Section 25.154(c) for both IBFS File No. SAT-MOD-20180319-00022 and IBFS File No. SAT-AMD- 20180104-00004 until **August 27, 2018**. Division staff contacted the legal counsel of parties who filed pleadings and who were potentially affected by the extension request and ascertained that there was no objection to the extension of time requested by OneWeb, provided an extension of time to file replies under Section 25.154(d) were also granted until after the Labor Day holiday and until after the deadline to file comments in a separate Commission rulemaking proceeding. Legal counsel to OneWeb confirmed to Division staff that OneWeb does not oppose such an extension of time. Accordingly, the deadline for parties to file reply comments pursuant to Section 25.154(d) for both IBFS File No. SAT-MOD-20180319-00022 and IBFS File No. SAT-AMD- 20180104-00004 is extended until **September 12, 2018**.



Stephen J. Duall
Chief, Satellite Policy Branch