

# MILBANK, TWEED, HADLEY & M<sup>c</sup>CLOY LLP

1850 K STREET, NW, SUITE 1100

WASHINGTON, DC 20006

202-835-7500

FAX: 202-835-7586

PHILLIP L. SPECTOR

Phone: 202-835-7540

Fax: 202-263-7540

E-mail: pspector@milbank.com

BEIJING

8610-5969-2700

FAX: 8610-5969-2707

HONG KONG

852-2971-4888

FAX: 852-2840-0792

SEOUL

822-6138-3500

FAX: 822-6138-3555

SINGAPORE

65-6428-2400

FAX: 65-6428-2500

TOKYO

813-5410-2801

FAX: 813-5410-2891

SÃO PAULO

55-11-3927-7700

FAX: 55-11-3927-7777

March 29, 2017

Federal Communications Commission  
International Bureau, Satellite Division  
44 12th Street S.W.  
Washington, D.C. 20554  
Attn: Mr. Jose Albuquerque, Chief

**RE: Space Norway AS, IBFS File No. SAT-LOI-20161115-00111 (Call Sign S2978)**

Dear Mr. Albuquerque:

Space Norway AS (“Space Norway”), by its attorneys, submits this letter with regard to the letter sent by you to Space Norway, dated March 10, 2017 (the “FCC Letter”). The FCC Letter related to the above-referenced petition to provide service to the United States market via Space Norway’s non-geostationary satellite orbit (“NGSO”) system, the Arctic Satellite Broadband Mission (the “ASBM”), which will comprise two satellites in highly elliptical orbits.

The FCC Letter asked Space Norway to respond to a set of largely technical questions by April 11, 2017. Space Norway respectfully requests that the Commission extend the deadline for filing Space Norway’s response to the FCC Letter to May 11, 2017. This brief extension would ensure that Space Norway has sufficient time to provide comprehensive and robust responses to the questions raised by the Commission in the FCC Letter.

Although the Commission does not routinely grant extensions of time,<sup>1</sup> the particular circumstances in this case justify the requested extension. Space Norway is currently reviewing

---

<sup>1</sup> See 47 CFR § 1.46(a).

the comments submitted in response to the *Notice of Proposed Rulemaking* issued by the Commission with respect to NGSO systems,<sup>2</sup> and is carefully evaluating whether to file reply comments. The filing deadline for reply comments is April 10, 2017,<sup>3</sup> one day before Space Norway's response to the FCC Letter would be due. Given that Space Norway is a start-up satellite company that has limited engineering and technical resources available to it, the proximity of these deadlines could hinder Space Norway's ability both to address issues in the rulemaking and to respond carefully and completely to the important questions raised in the FCC Letter.

Furthermore, Space Norway is currently in negotiations with several satellite manufacturers and has not yet selected which satellite manufacturer will assist Space Norway in the design, development and manufacture of the ASBM. Space Norway believes that obtaining input from each of these manufacturers is critical to ensuring that Space Norway is able to provide thorough and detailed analysis in response to the Commission's various questions regarding the design and operational strategies that will be employed by Space Norway to mitigate orbital debris. Space Norway has begun the process of obtaining input from each of the satellite manufacturers; however, this process is likely to require more time than what has been given to Space Norway in the FCC Letter.

While Space Norway understands the importance of the Commission's receiving prompt responses to its inquiries, Space Norway also believes that it is of the utmost importance that it provide complete, comprehensive responses to the questions in the FCC Letter. Granting Space Norway's request for an extension of time to respond would ensure that this is the case.

For the foregoing reasons, Space Norway requests that the Commission extend Space Norway's deadline for filing its response to the FCC Letter to May 11, 2017.

Very truly yours,

/s/ Phillip L. Spector

Phillip L. Spector  
Lafayette Greenfield  
Attorneys for Space Norway AS

Cc: Stephen Duall  
Kathryn Medley  
Satellite Division, FCC

---

<sup>2</sup> *In the Matter of Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, Notice of Proposed Rulemaking, 31 FCC Rcd 13651 (Dec. 15, 2016).

<sup>3</sup> *International Bureau Satellite Division Information*, Public Notice, DA 17-263 (Mar. 17, 2017).