

April 7, 2017

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

Re: *LeoSat MA, Inc., IBFS File No. SAT-LOI-20161115-00112 (Call Sign S2979)*

Dear Mr. Albuquerque:

LeoSat MA, Inc. (“LeoSat”) submits this letter in response to the Commission’s March 15, 2017 letter (“FCC Letter”) requesting additional information regarding LeoSat’s petition for declaratory ruling (“Petition”). LeoSat’s pending Petition seeks access to the U.S. market for a Ka-band low-Earth orbit (“LEO”) non-geostationary satellite orbit (“NGSO”) system to provide new broadband fixed satellite services (“FSS”).

The FCC Letter asks LeoSat to respond to a series of questions, including a question about LeoSat’s EPFD analysis and several questions addressing its orbital debris mitigation plans, by April 14, 2017. LeoSat respectfully requests that the Commission extend the deadline for LeoSat’s reply for thirty days, to May 15, 2017. This brief extension will provide LeoSat with critical time needed to conduct the necessary analyses so that it may provide a comprehensive response to the Commission’s questions.

Although the Commission does not routinely grant extensions of time,¹ the circumstances justify an extension in this case. LeoSat is further developing its orbital debris mitigation plan with Thales Alenia Space (TAS), the manufacturer of LeoSat’s constellation. A grant of the requested additional time to respond to the FCC Letter will enable LeoSat and TAS to develop and provide comprehensive answers to the FCC’s orbital debris inquiries and to further advance LeoSat’s orbital debris mitigation plan. Further, the EPFD analysis that LeoSat provided in its Petition was run on TAS’ proprietary software. In order to answer the Commission’s questions about LeoSat’s EPFD results in the FCC Letter, LeoSat will submit supplemental EPFD analysis derived from the ITU EPFD software. It can take a significant amount of time to run the EPFD analysis on the ITU’s software and LeoSat is unable to complete this analysis by April 14. Thus,

¹ See 47 C.F.R. § 1.46(a).

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an extension of time is warranted to enable LeoSat to provide the EPFD information requested by the FCC.

For the foregoing reasons, LeoSat requests the Commission to extend LeoSat's deadline for filing its response to the FCC Letter to May 15, 2017.

Sincerely,

WILKINSON BARKER KNAUER, LLP

/s/ Phillip R. Marchesiello

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