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March 30, 2017

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

**RE: ABS Global Ltd. – Petition for Declaratory Ruling Granting Access to the U.S.  
Market for ABS-3A (Call Sign S2987), File No. SAT-PDR-20161130-00124**

Dear Dr. Albuquerque:

ABS Global Ltd. (“ABS”) submits this letter with regard to the above-referenced Petition for Declaratory Ruling of ABS, which seeks U.S. market access for ABS-3A, a Ku- and C-band satellite operating at the 3.0° W.L. location (the “PDR”).

ABS is willing to accept the condition requested by Intelsat License LLC in its letter to the Federal Communications Commission (the “Commission”) dated February 21, 2017. ABS will comply with all existing and future space station coordination agreements reached between the Russian Federation and other Administrations regarding the nominal 3.0° W.L. location.

In addition, the Commission has inquired as to the status of the registration of ABS-3A as a space object under the United Nations Convention on Registration of Objects Launched into Outer Space (the "UN Convention"). ABS hereby informs the Commission that ABS is working with the nation of Papua New Guinea ("PNG") to have that nation register ABS-3A under the UN Convention. PNG has agreed to do so, but has not yet completed all necessary internal processes. ABS continues to engage with PNG government officials on registration, and will report to the Commission when ABS-3A is registered under the UN Convention.

In light of the above, ABS respectfully requests that the Commission expedite its grant of the PDR and authorize the ABS-3A satellite to serve the U.S. market.

Should you have any questions regarding this matter, please feel free to contact me at (202) 835-7540 or [pspector@milbank.com](mailto:pspector@milbank.com).

Very truly yours,

/s/ Phillip L. Spector

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