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November 19, 2010

VIA IBFS

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

Re: Application of Panasonic Avionics Corporation; FCC File Nos. SES-LIC-20100805-00992, SES-AMD-20100914-01163 and SES-AMD-20101115-01432 (Call Sign E100089) – Notice Regarding Filing Deadlines

Dear Ms. Dortch:

Row 44, Inc. (“Row 44”) hereby notifies the Commission of its intention to file a consolidated response to two submissions by Panasonic Avionics Corporation (“PAC”) in the above-captioned application proceeding on or before Wednesday, December 1, 2010, consistent with the FCC’s Rules.

On September 15, 2010, the FCC placed PAC’s August 5th application on Public Notice, establishing an October 15, 2010 deadline for comments or petitions. *See* FCC Report No. SES-01277. Row 44 timely filed a Petition raising questions regarding inconsistencies and omissions in the filing. PAC filed its “Response to Petition of Row 44, Inc.” (the “Response”) on November 15, 2010 pursuant to Section 25.154(e) of the FCC’s Rules. At the same time, PAC addressed some of its application’s deficiencies by filing essentially the same material, plus an FCC Form 312, as a further amendment to the pending application. *See* FCC File No. SES-AMD-20101115-01432.

Under Section 25.154(e), which refers to responses submitted by the applicant under this rule as oppositions under Section 1.45(c) of the Rules, any reply by Row 44 would be due within five (5) days of the deadline for filing the Response (*see* 47 C.F.R. § 1.45(c)), with an additional three (3) business days added because service was provided by mail. *See* 47 C.F.R. § 1.4(h).¹ Applying both rules, Row 44’s reply would be due no later than November 26, 2010, the day after the Thanksgiving holiday.

However, the amendment that contains the same material as the Response is subject to a different subsection of Section 1.45, which generally provides that a response to any FCC filing not otherwise

¹ *See, e.g., Row 44, Inc.*, 24 FCC Rcd 10223, 10226 n.10 (IB/OET 2009) (referencing “ViaSat Reply” to Section 25.154(e) filing).

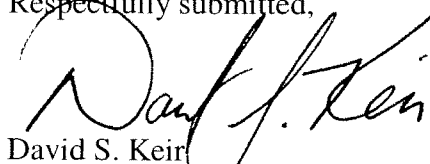


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subject to a separate FCC rule “may be filed within 10 days after the original pleading is filed,” (47 C.F.R. § 1.45(b)), again subject to an additional three (3) business days for pleadings served by mail. *See* 47 C.F.R. § 1.4(h). Application of these rules yields a filing deadline of Wednesday, December 1, 2010, five days later than under Section 25.154(e).

In light of these differing comment/reply deadlines for the two distinct, but essentially identical, November 15th PAC submissions, Row 44 proposes to file a single responsive pleading on Wednesday, December 1, 2010. This letter is being filed in an effort to avoid confusion about the status and timing of such a reply. To the extent required, Row 44 seeks a limited extension of time and/or waiver of any applicable FCC rules that may be necessary to permit both filing on this date and consideration of its additional comments in connection with the processing of PAC’s amended application.

Respectfully submitted,



David S. Keir
Counsel to Row 44, Inc.

cc: Carlos M. Nalda, Counsel to PAC
Stephen Duall, FCC (via email)
Paul Blais, FCC (via email)