



O3b Limited
1129 20th St. NW, Suite 1000
Washington, D.C. 20036
T 202.478.7100
www.ses.com/networks

21 February, 2019

By Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: O3b Limited Request for Extension of Earth Station Construction Deadline
File No. SES-LIC-20180122-00053 (Call Sign E180005)**

Dear Ms. Dortch:

O3b Limited ("O3b"), pursuant to Section 1.65 of the Commission's rules, 47 C.F.R. § 1.65, hereby updates the record with respect to the above-referenced earth station to request a six-month extension, until September 8, 2019, of the required construction completion date for the licensed O3b earth station in Naleehu, Hawaii, call sign E180005 (the "Hawaii Diversity Earth Station"). As discussed herein, grant of the requested extension is consistent with Commission precedent and will serve the public interest.

The Hawaii Diversity site will act as a diversity site for the O3b gateway in Sunset Beach, Hawaii,¹ increasing the reliability and flexibility of O3b's operations.

O3b has been delayed in building the gateway due to a number of factors, including significant volcanic eruption activity on the Island of Hawaii. As a result, O3b will be unable to complete the construction of the gateway by the date specified in the underlying license.

Section 25.117(e) of the Commission's rules, 47 C.F.R. § 25.117(e), provides that a request to extend a required completion date must be supported by information showing that additional time is needed due to circumstances beyond the applicant's control or that unique and overriding public interest concerns justify an extension.

Here, the buildout of the Hawaii Diversity Earth Station has been delayed due to Kilauea volcano's months-long eruption.² The Hawaii Diversity Earth Station is located just 45 miles

¹ See File No. SES-LIC-20100723-00952, Call Sign E100088.

² See, e.g., Robin George Andrews, *America's Most Hazardous Volcano Erupted This Year. Then it Erupted and Erupted.*, The New York Times (Dec. 12, 2018), <https://www.nytimes.com/2018/12/12/science/kilauea-hawaii-volcano-eruption.html>.

from Kilauea, creating great uncertainty regarding whether the site would withstand the eruption. The eruption had transformative effects on the Island, cutting off major roadways and destroying about 700 homes, forcing many to evacuate.³ The Hawaii Volcanoes National Park was closed for 135 days as volcanic activity caused explosive eruptions, triggered earthquakes, and formed ash clouds that blanketed the region in volcanic debris.⁴

The build-out of this facility requires on-site personnel oversight of construction. O3b delayed the earth station build-out until after it was certain that the site would withstand the eruption and O3b had the opportunity to fully assess the potential damage and deem it safe to proceed.

Granting the requested extension will permit O3b a limited additional period to finish the installation of facilities at the Hawaii Diversity Earth Station now that O3b has had enough time to properly assess risks created from Kilauea's eruption and to safely deploy personnel at the site.

The build-out of the Hawaii Diversity Earth Station will support advanced telecommunications offerings that the expansion of the O3b NGSO constellation will provide to U.S. businesses and consumers, enhancing competition and contributing to economic growth.

Under these circumstances, the public interest warrants grant of the requested extension of time to complete construction of the Hawaii Diversity Earth Station.

Please address any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Will Lewis

Will Lewis

Senior Legal Counsel for SES Networks
Will.Lewis@ses.com

Attachment

cc: Paul Blais
Kal Krautkramer

³ *Strict New Mandatory Evacuation Ordered as Hawaii Volcanic Eruption Hits 4-Week Mark*, CNBC, (June 1, 2018), <https://www.cnbc.com/2018/06/01/mandatory-evacuation-ordered-as-hawaii-eruption-hits-4-week-mark.html>.

⁴ *Hawaii Volcanoes National Park Reopens After Kilauea Eruption*, NBC News (Sept. 22, 2018), <https://www.nbcnews.com/news/us-news/hawaii-volcanoes-national-park-reopens-after-kilauea-eruption-n912256>.

DECLARATION

I, Will Lewis, hereby certify under penalty of perjury that I have reviewed the foregoing document and that it is complete and accurate to the best of my knowledge, information and belief. In particular, I certify that the requested six-month extension of time to complete construction of the Hawaii Diversity Earth Station is justified by unique and overriding public interest concerns and stems from circumstances beyond O3b's control.

/s/ Will Lewis
Will Lewis
Senior Legal Counsel
O3b Limited

Dated: February 21, 2019