

## REQUEST FOR EXTENSION OF TIME

Pursuant to Section 25.117(e) of the Commission's rules, Telesat Network Services, Inc. ("Telesat Network Services") hereby requests that the Commission modify its licenses for two fixed satellite service earth stations (Call signs E160134 and E160135) by extending by one year, until November 8, 2018, the date by which each station must be constructed and placed into operation. This exhibit accompanies two modification of license applications, one for E160134 and the other for E160135.

Such an extension is necessitated by the fact that the satellite with which each earth station will communicate, Telesat's Telstar 19 VANTAGE satellite ("T19V"),<sup>1</sup> will not be placed into service until the summer of 2018, at the earliest.<sup>2</sup> The date by which T19V can be placed into service is largely a function of the date by which the satellite's manufacturer completes construction of the satellite and the satellite can then be launched by Telesat's launched service provider. With well over 150 million U.S.

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<sup>1</sup> The licensee for T19V is Telesat International Limited ("Telesat International"), a commonly controlled affiliate of Telesat Network Services. Telesat Network Services and Telesat International are together referred to herein as "Telesat".

<sup>2</sup> At this time, the earliest practical time period for the satellite to be placed into service and the earth stations employed is July 2018. Given the kinds of scheduling delays that are relatively common in a project of this magnitude, a full year's extension is requested to allow for reasonable margin without having to go back to the Commission for a further extension.

dollars spent on these activities, Telesat has every incentive to work with its contractors to have T19V built, launched, and then placed into service at the earliest practical date.

The earth stations are an important component of Telesat's overall T19V project. They will serve as gateways for the Ka-band payload on T19V that will provide high capacity links to customers in the Caribbean. Especially in light of current earth station siting restrictions and the uncertainties associated with potential changes to these requirements, failing to extend the time period for the earth stations to be constructed and placed into operation could severely impinge on Telesat's ability to provide this service.

Telesat's extension request is consistent with Commission precedent. The Commission's International Bureau previously granted another earth station licensee, Hughes Network Services ("HNS"), a one year extension of the deadline for its earth stations be constructed and placed into operation under substantially comparable circumstances.<sup>3</sup> Like Telesat's earth stations, HNS' earth stations are licensed to communicate with T19V. HNS requested an extension based on the fact that T19V

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<sup>3</sup> See, Public Notice, *Satellite Communications Services Information re: Actions Taken*, Report No. SES-01979, HNS License Sub, LLC at 8 – 12, Aug 2, 2017.

would not be launched and operational when its earth stations would have been required to commence service.<sup>4</sup>

Telesat respectfully submits that in light of: (i) the public interest benefits the subject earth stations will serve; and (ii) Commission precedent, Telesat's request for additional time to complete the construction of its earth stations and place them into operation should be granted.

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<sup>4</sup> See HNS Licensee Sub, LLC, *Applications for Modification*, IBFS File No. SES-MOD-20170607-00622, Call sign E160068; IBFS File No. SES-MOD-20170607-00623, Call sign E160069; IBFS File No. SES-MOD-20170607-00626, Call sign E160066; IBFS File No. SES-MOD-20170607-00627, Call sign E160065; IBFS File No. SES-MOD-20170607-00628, Call sign E160067.

DECLARATION

I, Elisabeth Neasmith, Director, Spectrum Management and Development, hereby declare under penalty of perjury that the statements of fact made in the foregoing Request for Extension of Time, in particular as to Telesat's inability to place the referenced earth stations into operation within the time permitted under their current licenses, are true and correct to the best of my knowledge, information, and belief.



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Signature

7 Sep 2017

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Date