

REQUEST FOR EXTENSION OF TIME

Pursuant to Section 25.117(d) of the Commission's rules, Telesat Network Services, Inc. ("Telesat") hereby requests that the Commission modify its license for Telesat's fixed satellite service earth station (Call Sign E160134) in Middletown, Virginia ("Middletown Earth Station"), by extending by three months, until March 10, 2020, the date by which the Middletown Earth Station must, following construction, be placed into operation by communicating with the earth station's sole authorized point of communication, Telesat's Telstar 19 VANTAGE satellite ("T19V").

The extension is necessitated by circumstances beyond Telesat's control that delayed the Middletown Earth Station's construction and placement into operation, as follows: Telesat has had on order two of the same type antennas, one to be installed at one of its Canadian earth station facilities, the other at Middletown. The antenna destined for Telesat's Canadian facility was delivered first. Upon inspection, on or about September 25, 2019, Telesat discovered that the antenna's waveguide had been manufactured improperly, which meant a proper connection could not be established. Telesat confirmed that the same error affected the antenna destined to be installed at Middletown.

A remanufacture of the waveguides is underway and construction of the Middletown Earth Station is now scheduled for completion in late December 2019. Additional time, however, through March 10, 2020, is herein requested to allow sufficient time for adequate integration and testing of the Middletown Earth Station as well as to allow some margin for potential delays due to winter weather; heretofore unexpected construction activities by the site's new owner/landlord that could present site access issues; and any other unanticipated events.

The Middletown Earth Station will serve as a back-up gateway for the Ka-band payload on T19V, supporting high capacity links to customers in the Caribbean. A

back-up gateway facility is a diversity requirement of these customers. The diversity or back-up site must be a sufficient distance from the primary gateway site for T19V, already constructed and placed into operation at Mount Jackson, to ensure that rain events at the primary and back-up site are not correlated. The back-up site also has to be within the maximum range of the RF over fiber system that connects the two sites. The maximum distance with the existing system is approximately 50 miles (70 km). These criteria make Middletown an ideal location for a back-up facility. Grant of the requested extension will ensure that Telesat can complete construction at this location and provide back-up capabilities required by its customers.

Accordingly, and in light of the public interest benefits the Middletown Earth Station will serve, Telesat's request for additional time to complete the construction of the Earth Station and place it into operation should be granted.

DECLARATION

I, Leslie Milton, Senior Counsel, Regulatory Affairs, Telesat, 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 ability to place the referenced earth station in operation within the time permitted under its current license, are true and correct to the best of my knowledge, information and belief.

/s/ _____

Signature

October 15, 2019

Date