

**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 the fixed satellite service earth station (Call Sign E160134) in Middletown, Virginia, by extending by six months, until May 8, 2019, the date by which the 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 T19V's construction and its placement into service. The construction delays were followed by changes in the schedule for the customer commitments that are a prerequisite to the earth station's development.

Construction of T19V was originally expected to be complete by March 2018. During the course of construction of the satellite, however, there were a number of delays due to late delivery of components and to the requirement to re-work some construction and perform additional testing to ensure the satellite met all of its design and performance specifications. Consequently, the launch of the satellite was delayed until July 22, 2018. Following launch, orbit-raising and extensive in-orbit testing, T19V is expected to enter into service in September 2018.

The 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 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.

The Commission previously granted a one-year extension to complete construction of the earth station. At the time, it was expected that the satellite would be in service by July 2018 and that commitments from customers requiring gateway diversity would be in place by January 2018. These commitments would have enabled Telesat to proceed with construction of the Middletown site in early 2018, with commencement of operations at the site by November 2018. However, customers requiring diversity have been unwilling to commit to purchasing capacity on T19V until the satellite is in operation. Based on the delayed in-service date of September 2018, Telesat anticipates that it will have customer commitments this Fall. Once these customer commitments are in place, Telesat can commence construction in Middletown. A six month extension should provide the time required to construct the earth station and commence operations.

Given earth station siting restrictions established by the Commission's Spectrum Frontiers decisions, failing to extend the time period for the earth station to be constructed and operational could severely impinge on Telesat's ability to provide service to Caribbean customers. While the earth station is located in a rural area with limited population, the location is proximate to Interstate 95, which could be fatal under the rules adopted in the Spectrum Frontiers proceeding if the Middletown earth station loses its grandfathered status. Furthermore, as discussed above, the Middletown location is ideally suited as a back-up diversity site.

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/ Leslie Milton

August 21, 2018

Date