

Law Offices of
Robert G. Allen, P.C.

Forest Point Center
9300 Forest Point Circle
Manassas, Virginia 20110

Telephone: +(1)-703-361-2278
Telecopier: +(1)-703-783-0791
E-mail: rgallen@rgallen.com

September 27, 2013

VIA HAND DELIVERY & IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Request for Extension of Time to Consummate Transaction

Shared Data Networks, LLC
File No. SES-T/C-20130612-00491
Call Signs E050007, E881406 and E920415

Dear Ms. Dortch:

Satcom Distribution, Inc (“SDI”), by its undersigned counsel, respectfully requests an additional 60 days to consummate the above-referenced transfer of control of the three fixed-satellite service earth stations licensed to Shared Data Networks, LLC under Call Signs E050007, E881406 and E920415 from SDI to Synergy Core, LLC. With this request, SDI seeks until November 26, 2013 to complete the subject transaction.

The International Bureau granted the transfer of control application effective July 29, 2013. *See Public Notice*, Report No. SES-01573 (July 31, 2013). Under Section 27.119(f) of the Commission’s rules, the Bureau’s action established September 27, 2013 as the date by which the subject transaction is to be completed.

The parties have been working diligently to close the transaction within the period specified in the rules. Unfortunately, additional time is necessary for closing documents to be finalized. The parties are pressing forward towards completing the documentation and other transitional activities so that the transfer of control can be consummated as soon as possible. The parties expect to complete and sign the documentation necessary for closing within the next week or so. However, in order to avoid the need to seek further extension in the event unforeseen complications arise, the parties respectfully request a 60-day extension of the

period of time as set out in Section 25.119(f). The undersigned has been in communication with the proposed transferee who is in concurrence with this request.

The application was not contested and there have been no material changes in the applicants' circumstances since it was granted. The Bureau has determined that the transfer of control would be consistent with the public interest. No other parties are adversely affected by this request for extension of time. SDI will make every effort to complete the transaction as soon as possible.

The Bureau has previously granted requests to extend the transfer of control consummation period of earth station licensees unable to close their transactions within the initial 60-day period. *See, e.g.* Robert M. Franklin, Transferor and Inmarsat, plc, Transferee, 24 FCC Rcd 449, 484 (IB 2009) (granting Inmarsat's request to complete transaction within 180 days to permit a consolidated closing of various authorization types). Comparable treatment is appropriate here and is therefore respectfully requested.

Approval of this request also will serve the public interest by avoiding the need for the parties to submit a new transfer of control application, which Bureau staff would in turn be required to process. Preparing, filing and processing this second, duplicative request would be wasteful and an inefficient use of limited Bureau resources. The public interest will be better served by extending the consummation deadline to encompass a period within which SDI expects the transfer of control to occur.

For the foregoing reasons, SDI requests an additional 60 days to consummate through November 26, 2013. Should you have any questions regarding this request, please contact the undersigned counsel.

Respectfully Submitted,



Robert G. Allen
Counsel to Satcom Distribution, Inc.

cc: Karl Kensinger (by e-mail)

Jeanette Spriggs (by e-mail)