

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Petition for Modify Parts 2 and 101 of the	)	
Commission's Rules to Enable Timely	)	RM-11809
Deployment of Fixed Stratospheric-Based	)	
Communications Services in the 21.5-23.6,	)	
25.25-27.5, 71-76 and 81-86 GHz Bands	)	

**MOTION OF ELEFANTE GROUP, INC. FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46, Elefante Group, Inc. ("Elefante Group" or the "Company"), by its attorneys, respectfully requests an extension of time to file a reply to comments in response to its above-captioned Petition for Rulemaking ("Petition").<sup>1</sup> For the reasons stated herein, Elefante Group seeks an additional twenty (20) days to file its reply, which would extend the deadline to August 15, 2018. Elefante Group envisions the extension would apply to all persons and entities interested in replying to the opening comments.

Elefante Group makes this request because several additional quantitative analyses involving multiple spectrum bands are required to respond fully to the comments filed on the Petition. While only nine parties filed opening comments, nearly all of the comments raise distinct spectrum compatibility questions – sometimes a number of questions – that will require Elefante Group with Lockheed Martin to conduct additional technical analyses to be able to reply. While Elefante Group and Lockheed Martin moved deliberately to commence the analysis, because Elefante Group's proposal is to introduce Stratospheric-Based

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<sup>1</sup> See *Petition for Modify Parts 2 and 101 of the Commission's Rules to Enable Timely Deployment of Fixed Stratospheric-Based Communications Services in the 21.5-23.6, 25.25-27.5, 71-76 and 81-86 GHz Bands*, RM-11809, Petition for Rulemaking (filed May 31, 2018).

Communications Services (“SBCS”) operating compatibly with incumbent and proposed uses in a number of encumbered bands, it is not surprising that a wide variety of technical questions were raised. The additional time is needed to allow a full record to be developed on the issues raised in the comments, so as to best assist the Commission in making an informed decision on next steps regarding the Petition.

In particular, in support of its reply to opening comments, Elefante Group is engaging in additional technical analyses concerning the following:

- Matters of SBCS and Radio Astronomy compatibility raised by the National Radio Astronomy Observatory; in several bands – the Ka-band, which Elefante Group proposes for User Terminal-Stratospheric Airborne Platform Stations (“STRAPS”), and the 71-76 and 81-86 GHz bands (“E-Band”), which Elefante Group proposes for SBCS feeder links;
- Questions posed by the Fixed Wireless Communications Coalition (“FWCC”) aimed at improving coordination and compatibility of SBCS with fixed services in the 21.5-23.6 GHz band;
- Comments provided by Audacy Corporation regarding SBCS compatibility in the 22.55-23.18 and 23.18-23.38 GHz bands with its recently authorized non-geostationary orbit (“NGSO”) satellite network, namely comments regarding its medium-earth orbit (“MEO”) relay satellites and questions raised regarding certain putative receiver characteristics proffered by Audacy for the first time (e.g., antenna gain and receiver sensitivity) for its envisioned customers operating future low-earth orbit (“LEO”) satellites;
- A more detailed framework for coordinating and sharing spectrum in the E-band with fixed point-to-point links to respond to comments by FWCC;
- Responses to Loon LLC and Aeronet Global Communications Inc. that the Commission should ensure that action on SBCS minimizes or precludes foreclosure of additional, prospective airborne applications in the E-band; and
- Concerns raised by SES Americom, Inc. and O3B regarding compatibility with prospective Fixed Satellite Service operations in the E-band, such as the uses described in a pending WorldVu Satellites Limited application.<sup>2</sup>

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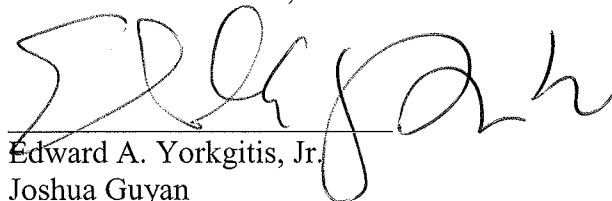
<sup>2</sup> See WorldVu Satellites Limited, File No. SAT-AMD-20180104-00004, Call Sign S2994.

While Elefante Group is confident that it can address each of these technical matters, as well as other points made in the opening comments, additional time is required to complete the technical work and write-ups that is provided for in the rules. In the interests of developing a full and complete record – the value of which has been recognized by a number of the commenters – the Company requests an extension of its deadline to reply to the comments filed on its Petition. Elefante Group therefore respectfully requests that the time for submission of its reply comments be extended from July 26, 2018, until August 15, 2018.

Grant of the extension will not prejudice any party that filed initial comments or any other person given that there is no formally prescribed time for further comment. The extension should apply to all persons interested in filing replies. Further, to the extent relevant, if the extension is granted, the replies will be filed four weeks before opening comments are required on the Spectrum Frontiers Third Further Notice of Proposed Rulemaking in GN Docket No. 17-177, which addresses future potential in the 25.25-27.5 GHz band, as does Elefante Group's Petition.

Respectfully submitted,

ELEFANTE GROUP, INC.

A handwritten signature in black ink, appearing to read 'E. Yorkgitis, Jr.', is written over a horizontal line.

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July 17, 2018