

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Comprehensive Review of Licensing)	IB Docket No. 12-267
and Operating Rules for Satellite)	
Services)	

MOTION FOR 45-DAY EXTENSION OF TIME TO FILE COMMENTS

The Satellite Industry Association (“SIA”) hereby requests that the Commission extend by 45 days the comment deadlines established by the Commission in its October 31, 2014 Further Notice of Proposed Rulemaking (“FNPRM”) in the above referenced proceeding.¹

SIA is a U.S.-based trade association providing worldwide representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. Since its creation almost twenty years ago, SIA has advocated for the unified voice of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business.² As the primary organization voicing

¹ See Comprehensive Review of Licensing and Operating Rules for Satellite Services, Proposed Rule, 79 Fed. Reg. 65,106-65,137 (Oct. 31, 2014).

² SIA Executive Members include: The Boeing Company; The DIRECTV Group; EchoStar Corporation; Harris CapRock Communications; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; LightSquared; Lockheed Martin Corporation; Northrop Grumman Corporation; SES Americom, Inc.; SSL; and ViaSat, Inc. SIA Associate Members include: Airbus DS SatCom Government, Inc.; Artel, LLC; ATK Inc.; Cisco; Cobham SATCOM Land Systems; Comtech EF Data Corp.; DigitalGlobe, Inc.; DRS Technologies, Inc.; Encompass Government Solutions; Eutelsat America Corp.; Globecom Systems, Inc.; Glowlink Communications Technology, Inc.; Hughes Network Systems; iDirect Government Technologies; Inmarsat, Inc.; Exelis, Inc.; Marshall Communications Corporation.;

the interests of the U.S.-based satellite industry, SIA has a significant interest in the successful outcome of this proceeding.

The Commission is seeking comment on several dozen proposals with significant domestic and international implications for the satellite industry. In particular, the Commission seeks comment on possible process changes related to how the FCC makes satellite network filings at the International Telecommunication Union (ITU). Due to the ongoing ITU Plenipotentiary Conference currently taking place in Korea, however, many satellite industry experts on this topic are unavailable during the designated comment period.

Moreover, given the significant implications to the industry of many of the proposals set forth by the Commission, SIA believes that additional time will be necessary to carefully consider and to respond to these proposals. Accordingly, an extension would be in the public interest by allowing for a more full development of the record.

SIA respectfully urges the Commission to extend the deadline for comments on the proposals in the FNPRM from December 15, 2014 to January 29, 2015, with reply comments due March 2, 2015.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION

A handwritten signature in black ink, appearing to read "Sam Black", is centered on a light gray rectangular background.

Sam Black, Acting President
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November 10, 2014