

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

In the Matter of

Comprehensive Review of Licensing and  
Operating Rules for Satellite Services

IB Docket No. 12-267

**REQUEST FOR EXTENSION OF COMMENT DEADLINE**

Intelsat License LLC (“Intelsat”) hereby respectfully requests an extension of the comment deadline in the above-captioned proceeding, currently set for December 24, 2012.<sup>1</sup> In this proceeding, the Federal Communications Commission (“FCC” or “Commission”) seeks to undergo a comprehensive review of Part 25 of its rules to “modernize the rules to better reflect evolving technology, eliminate unnecessary technical and information filing requirements for applicants requesting space and earth station licenses, and reorganize and simplify existing requirements.”<sup>2</sup> Intelsat requests that the Commission extend the deadline for comments by three weeks until January 14, 2013. A short-term extension is in the public interest to allow interested parties to address meaningfully the multiple and highly technical issues raised in this proceeding.

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<sup>1</sup> See *Comprehensive Review of Licensing and Operating Rules of Satellite Services*, Proposed Rule, 77 Fed. Reg. 67172 (Nov. 8, 2012).

<sup>2</sup> See *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Notice of Proposed Rulemaking, IB Docket No. 12-267, FCC Docket No. 12-117 at ¶ 3 (Sept. 28, 2012) (“*Notice*”).

Intelsat welcomes the Commission's efforts to update and streamline its regulatory requirements through a comprehensive review of Part 25 of the Commission's rules. Intelsat operates a vast network of U.S.-licensed space stations and earth stations and thus will be a party affected by the revised rules.

Due to the comprehensive nature of the rulemaking, Intelsat believes that additional time is necessary to examine carefully the host of issues raised in the *Notice*. The FCC itself explains that "this Notice is our first wholesale examination of the rules governing satellite services in over a decade."<sup>3</sup> Intelsat is studying diligently the Commission's many policy-oriented and technical proposals. Additional time for careful consideration of the plethora of proposed reforms will help the Commission develop a robust record that includes input from the satellite industry, thereby enhancing the rulemaking process.

Intelsat further notes that the imminent holiday season poses an obstacle to its ability to bring necessary resources to bear and provide meaningful input in this rulemaking. As a result of the comprehensive nature of the review of Part 25, a thoughtful and thorough response requires the time of a number of personnel, many of whom will be on leave for the holiday season. Intelsat therefore requests a relatively short three-week extension of the comment deadline until January 14, 2013.

Intelsat recognizes that requests to extend filing deadlines are not routinely granted, but the Commission has previously found that an extension is warranted when necessary to ensure that the Commission receives full and informed responses and that affected parties have a

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<sup>3</sup> *Id.* at ¶ 2.

meaningful opportunity to develop a complete record for the Commission's consideration.<sup>4</sup>

Under these circumstances, and given the comprehensive nature of this rulemaking proceeding, Intelsat believes that the proposed extension of time is appropriate.

Intelsat appreciates the Commission's consideration of its request to extend the deadline for filing comments in this comprehensive rulemaking for three weeks -- until January 14, 2013.

Respectfully submitted,

Intelsat License LLC

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December 17, 2012

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<sup>4</sup> See, e.g., *Wireless Telecommunications Bureau Grants Extension of Time to File Reply Comments on Commercial Mobile Radio Services Market Competition*, Public Notice, WT Docket No. 09-66, DA 09-1419 (WTB rel. June 24, 2009) (granting 14-day extension in order for "development of a complete record on the issues"); *Media Bureau Grants Extension of Time to File Comments and Reply Comments In Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, MB Docket No. 04-233, DA 08-515 (MB 2008) ("we agree that an extension of the comment and reply comment period is warranted to enable commenters to adequately review, investigate, and comment on the specific issues raised in the NPRM and respond to the extensive comments filed in response thereto"); *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, Order, 20 FCC Rcd 19868, ¶ 3 (WTB 2005); *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band, Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Order, 23 FCC Rcd 10527, ¶ 4 (WTB 2008); *Elimination of Rate-of-Return Regulation of Incumbent Local Exchange Carriers, Federal-State Joint Board on Universal Service*, Order, 18 FCC Rcd 26307, ¶ 2 (WCB 2003); *Telephone Number Portability*, Order, 18 FCC Rcd 26604, ¶ 2 (WCB 2003).