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, 2012.¹ 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."² 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.


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.”\(^3\) 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

---

\(^3\) *Id.* at ¶ 2.

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

By: /s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation
3400 International Drive, N.W.
Washington, DC 20008
202.944.7848

December 17, 2012