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# Federal Communications Commission

WASHINGTON, D.C. 20554

Federal Communications Commission  
Office of the Secretary

NOV 8 1990

Domestic Facilities Division  
Satellite Branch

In re the Application of )  
 )  
ORBITAL COMMUNICATIONS CORPORATION )  
 )  
For Authority to Construct a )  
Low-Orbit Mobile Satellite System )

File No. <sup>28</sup> 33-DSS-MP-90 (20)

To: The Commission

MOTION FOR LEAVE TO FILE COMMENTS OUT OF CYCLE

STARSYS, Inc. ("STARSYS"), by its attorneys, hereby requests leave to file comments in response to the September 21, 1990 amendment of Orbital Communications Corporation ("Orbcomm") to its above-captioned application. STARSYS' comments are limited in scope, addressing only one aspect of the supplemental financial showing submitted by Orbcomm.

It was STARSYS' intention to submit these comments after it had had an opportunity to analyze any additional applications submitted in response to the Commission's September 21, 1990 cut-off deadline for the filing of additional low earth orbit ("LEO") mobile satellite service ("MSS") system applications. STARSYS believed that two additional LEO MSS system applications were filed with the Commission on September 21, 1990, but was only able to identify one application in the Commission's public files. As the

status of the second LEO MSS application remained uncertain, and remains uncertain to this date, STARSYS determined that it should wait no longer to file its attached pleading.

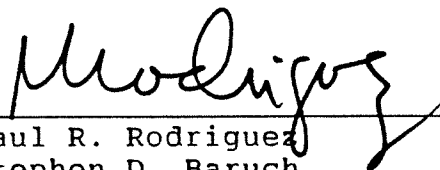
Acceptance of STARSYS' additional comments will not prejudice any other LEO MSS applicant, and will not delay the ultimate promulgation of rules and policies relating to the establishment of the new LEO MSS service.

For the reasons stated above, STARSYS urges the Commission to find that good cause exists for the acceptance of the attached comments, and to grant this motion.

Respectfully submitted,

STARSYS, INC.

By:

  
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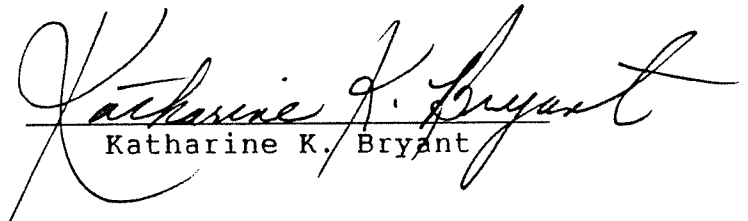
November 7, 1990

Its Attorneys

CERTIFICATE OF SERVICE

I, Katharine K. Bryant, do hereby certify that a copy of the foregoing "Motion for Leave to File Comments Out of Cycle" was mailed, United States first-class postage prepaid, this 7th day of November 1990 to the following:

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