

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

RECEIVED

NOV - 1 2004

Federal Communications Commission
Office of Secretary

File No. SAT-MOD-20011130-00018
Received

NOV 0 2 2004

Policy Branch
International Bureau

In the Matter of)
)
Public Notice, Da. No. 04-3176)
(October 1, 2004) Grant of Application)
For Modification of Telstar 11R)
Authorization,)
Call Sign S 2357)
)
Loral Orion, Inc. (Debtor-In-Possession))
)
)
)
Petition for Partial Reconsideration)
And Request for Waiver)

Int'l Bureau

NOV 0 2 2004

Front Office

PETITION FOR PARTIAL RECONSIDERATION AND
REQUEST FOR WAIVER

John P. Stern
Deputy General Counsel
Loral Space & Communications Ltd.
(Debtor-In-Possession)
600 Third Avenue
New York, New York 10016
(212) 338-5228

November 1, 2004

TABLE OF CONTENTS

	<u>Page</u>
SUMMARY.....	i
I. BACKGROUND	2
II. SECTION 25.165 OF THE COMMISSION'S RULES BY ITS TERMS DOES NOT APPLY TO SATELLITE LICENSE MODIFICATIONS.....	4
III. THE COMMISSION'S ORDER IMPOSING THE BOND SPECIFICALLY LIMITED APPLICATION OF THE BOND REQUIREMENT TO PENDING APPLICATIONS FOR NEW SATELLITE LICENSES.....	6
IV. EVEN IF THE COMMISSION FAILS TO RESCIND THE BOND REQUIREMENT, IT SHOULD GRANT LORAL'S REQUEST FOR A WAIVER OF SECTION 25.165(A) OF THE COMMISSION'S RULES	11
V. CONCLUSION.....	15

SUMMARY

Under a plain reading of 47 C.F.R. Section 25.165, a performance bond may only be imposed on “satellite licenses” issued after the effective date of the rule and not on license modifications. The Bureau erred in applying the performance bond to Loral’s request to modify a preexisting satellite replacement license. Moreover, the Commission’s orders make clear that the bond rule was intended to have limited application to certain new satellite applications, not modification requests, pending at the time the bond rule became effective to avoid imposing a burden on existing licensees, pursuant to well established retroactivity criteria.

In the alternative, should the Petition for Reconsideration be dismissed, Loral seeks a waiver of the rule for good cause. Loral’s Telstar satellites have provided critical capacity used for public safety services by agencies including the Federal Emergency Management Agency, the Department of Defense, and the Department of Homeland Security, and Telstar 11R would continue to provide capacity for such public safety services. The Commission has specifically cited provision of such public safety services as a factor weighing in favor of a request for waiver of the bond requirement. Loral is also in a Chapter 11 reorganization process precipitated by significant financial hardship and can ill afford the substantial costs associated with maintaining the bond. Waiver is also justified here because even if the Bureau’s action could be upheld under the new bond rule, the retroactive financial burden on Loral, as an existing licensee, remains substantial. Finally, the nearly three-year pendency of Loral’s modification request followed by almost immediate Bureau action following the effective date of a revised bond rule under which the Bureau seeks to impose the bond here presents an equitable reason for grant of the waiver.

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

In the Matter of)	
)	
Public Notice, Da. No. 04-3176)	
(October 1, 2004) Grant of Application)	File No. SAT-MOD-20011130-
For Modification of Telstar 11R)	00018
Authorization,)	
Call Sign S 2357)	
)	
Loral Orion, Inc. (Debtor-In-Possession))	
)	
)	
Petition for Partial Reconsideration)	
And Request for Waiver)	

**PETITION FOR PARTIAL RECONSIDERATION AND
REQUEST FOR WAIVER**

Loral Orion, Inc. (Debtor-In-Possession) (“Loral”) submits this petition for partial reconsideration of the International Bureau’s grant of Loral’s Request for Modification of its Telstar 11R authorization. Specifically, Loral requests that the Bureau rescind or strike condition 2(e) in the attachment to the Telstar 11R Modification Grant, that required Loral to execute and file a \$3 million dollar bond. Under a plain reading of the Commission’s bond rule, and in light of the policies set forth in the Commission’s underlying orders as well as established retroactivity law, the Bureau should not have retroactively imposed the bond requirement which took effect in 2004, on a replacement satellite license that the Commission granted in 2001.

In the alternative, should the Commission determine that the imposition of the bond requirement was justified, Loral seeks a waiver of the rule. Loral satellites have provided critical capacity used for public safety services by agencies including the Federal Emergency Management Agency (FEMA), the Department of Defense, and the Department of Homeland Security, and Telstar 11R would continue to provide capacity for such public safety services. The Commission has specifically cited provision of such public safety services as a factor weighing in favor of a request for waiver of the bond requirement. Loral is also in a Chapter 11 reorganization process precipitated by significant financial hardship and can ill afford the substantial costs associated with maintaining the bond.

In the interim, Loral posted the bond on October 28, 2004, to comply with the bond condition that is being challenged and to prevent possible automatic cancellation of its license.

I. BACKGROUND

Telstar 11, a Ku-band satellite formerly known as Orion 1 and operated by Loral's predecessor in interest, Orion Atlantic, L.P. ("Orion"), has been operating at 37.5° W.L. since January 20, 1995. Telstar 11 is one of the series of Telstar FSS satellites that have provided a range of services to government and commercial users including critical public safety services provided to Americans via the Federal Emergency Management Agency and the Department of Defense. Orion filed an application to replace the satellite on May 8, 1998. On June 19, 2001 the Commission authorized Loral CyberStar, Inc. to

construct, launch and operate Telstar 11R as a Ku-band-only replacement for Telstar 11.¹ Loral promptly requested that the Bureau adjust the construction milestones.² The 2001 Replacement Authorization had required completion of construction by January 2003, a date that was reasonable when the application was filed in 1998 but could not have been met three years later when the Commission acted on the application, as it would have allowed just fourteen months in which to construct the satellite. Loral's milestone adjustment request was unopposed. Then, in November 2001, Loral filed an application for a modification of its authorization to use an additional 250 Mhz of spectrum in the extended Ku-band (2001 Modification Request).³ The 2001 Modification Request was also unopposed.

On October 1, 2004, the Commission released a public notice containing the International Bureau's grant of the 2001 Modification Request.⁴ The Bureau grant stamped the request and attached a set of conditions, including new construction milestones and a requirement that Loral file a bond in the amount of \$3 million by October 28, 2004.⁵ The Bureau dismissed Loral's request to adjust the milestones as moot. Loral executed a bond in that amount on Thursday, October 28, 2004 after

¹ Application of Loral Space & Communications Ltd., f/k/a/ Orion Atlantic, L.P., for Authority to Launch and Operate a Hybrid Ku-band/C-band Satellite System at the 37.5 W.L. Orbit Location, File No. SAT-LOA-19980508-00043, DA-01-1427, *Memorandum Opinion and Order*, 16 FCC Rcd. 12,490 (2001) ("2001 Replacement Authorization").

² Letter from John Stern, Deputy General Counsel, Loral Space & Communications Ltd., to Thomas S. Tycz, Chief, Satellite Division, International Bureau, FCC, dated July 19, 2001.

³ SAT-MOD-20011130-00018.

⁴ Public Notice, Da. No. 04-3176 (October 1, 2004) Grant of Application for Modification of Telstar 11R Authorization, SAT-MOD-20011130-00018, Call Sign S 2357 ("Telstar 11R Modification Grant"). Loral Orion, Inc. (Debtor-In-Possession) is the entity that currently holds the authorization for Telstar 11R.

⁵ Telstar 11R Modification Grant, Attachment, Condition (2)(e).

receiving approval to do so from Federal Bankruptcy Court Judge Robert Drain. Loral timely filed a copy of the bond with the Commission the same day, to protect against automatic cancellation of its Telstar 11R Modification Grant for failure to meet the bond condition

II. SECTION 25.165 OF THE COMMISSION'S RULES BY ITS TERMS DOES NOT APPLY TO SATELLITE LICENSE MODIFICATIONS

The FCC rule requiring the posting of bonds, section 25.165, states in relevant part:

- (a) For all satellite licenses issued after September 20, 2004, other than DBS licenses, DARS licenses, and replacement satellite licenses as defined in paragraph (e), the licensee is required to post a bond within 30 days of the grant of its license. Failure to post a bond will render the license null and void automatically.
 - (1) NGSO licensees are required to post a bond in the amount of \$5 million
 - (2) GSO licensees are required to post a bond in the amount of \$3 million

* * * * *

- (e) A replacement satellite is one that is
 - (1) authorized to be operated at the same orbit location, in the same frequency bands, and with the same coverage area as one of the licensee's existing satellites and
 - (2) scheduled to be launched so that it will be brought into use at approximately the same time as, but no later than, the existing satellite is retired.⁶

Loral contends that the Bureau improperly applied this rule retroactively upon the 2001 Replacement Authorization because the Commission did not "issue" a "satellite license" when it grant stamped Loral's 2001 Modification Request. The Commission issued its replacement satellite license for Telstar 11R to Loral in 2001 (what the Bureau itself refers to as the "2001 Replacement Authorization"), more than two years before the

⁶ This rule, 47 C.F.R. section 25.165, was modified (as quoted above) by the Commission in its First Order on Reconsideration and Fifth Report and Order ("First Order on Reconsideration")(IB Docket 02-34)(rel. July 7, 2004). The first bond rule, imposed by the Commission in the First Report and Order, became effective on September 11, 2003.

first bond requirement took effect. The 2001 Replacement Authorization gave Loral final authority to construct, launch and operate its replacement satellite, Telstar 11R, at 37.5° W.L. Thus, Loral already had its replacement satellite license when it applied for a modification of that license to use additional Ku-band frequencies in November 2001. Indeed, Loral had already promptly executed a contract for construction for Telstar 11R in November 2001, in compliance with the original construction commencement milestone imposed by the Commission in its 2001 Replacement Authorization, at the time that it applied for its modification. By merely grant stamping Loral's unopposed 2001 modification request to add additional spectrum to Loral's 2001 Replacement Authorization, the International Bureau could not be deemed to have issued a second replacement satellite license to Loral for the same orbital location. The Telstar 11R "satellite license" had already been "issued" in 2001. It was the modification to that license that was granted after the bond rule became effective, not the "satellite license" that is subject to the bond requirement in section 25.165(a).

The Commission has traditionally differentiated in its rules between space station licenses and space station license modifications. There are separate provisions in the Commission's rules for each.⁷ In the Commission's First Report and Order, in which it set out its new satellite licensing rules, including the bond requirement, it maintained this traditional distinction between "modifications", which it defined as "changes to a licensee's operating authority after its license has been granted" and "new satellite license

⁷ 47 C.F.R. Sections 25.114 and 25.117.

applications.”⁸ Accordingly, under a plain reading of Section 25.165 of the Commission’s rules, the Bureau erred in imposing the bond as a condition to the Telstar 11R Modification Grant.

III. THE COMMISSION’S ORDER IMPOSING THE BOND SPECIFICALLY LIMITED APPLICATION OF THE BOND REQUIREMENT TO PENDING APPLICATIONS FOR NEW SATELLITE LICENSES

The Commission’s First Report and Order sets out its new satellite licensing rules, including the initial version of the bond requirement. That Order’s detailed and specific discussion of which applications pending as of the effective date of the bond rule could be subject to that rule yields further support for Loral’s argument that the bond requirement was not intended to apply retroactively to preexisting satellite licenses, such as Loral’s 2001 Replacement Authorization, or to modifications of such preexisting authorizations. The Commission began its retroactivity discussion by stating that “we will apply the rules and procedures we adopt in this Order to pending applications, in cases where doing so will help further the goals of this proceeding to expedite service to the public and discourage speculation.”⁹ This statement makes clear that the Commission’s new rules would apply to some but not all applications pending as of the effective date of the bond rule. The First Report and Order relied on established retroactivity law for the criteria it would use to make such determinations. The Commission articulated the following well established and limited circumstances for retroactive application of new rules to pending applications: “The Commission can apply new procedures to pending applications if doing so does not impair the rights an applicant

⁸ Amendment of the Commission’s Space Station Licensing Rules and Policies, First Report and Order and Further Notice of Proposed Rulemaking, IB Docket No. 02-34, 18 FCC Rcd 10760 (“First Report and Order”), ¶¶ 141-144.

⁹ First Report and Order, ¶ 275.

possessed when it filed its application, increase an applicant's liability for past conduct, or impose new duties on applicants with respect to transactions already completed."¹⁰ The Commission went on to conclude that application of the new rules to the types of applications it specified in its First Report and Order would not have any of the prohibited effects.¹¹

But that conclusion was based on the Commission's clarification that to satisfy the criteria for retroactive application of new rules to pending applications, only applications for new satellite licenses would be subject its new satellite licensing rules, including the bond rule. Specifically, the Commission stated: "We emphasize that some of the rules we apply to pending applications do not apply to licenses *granted* before this Order was adopted. Thus, licensees will not be required to post a bond for licenses they have been granted in the past."¹² And the Commission wrote: "We will apply this bond requirement to new satellite licensees only, not replacement satellites. Once a licensee has begun to provide service, we are confident that its replacement satellite application will be intended to continue service, and would not be filed for speculative purposes." As recently as July 6, 2004, the Commission reaffirmed this policy: "[W]e reiterate that the Commission did not adopt a bond requirement for replacement satellites."¹³ By effectively imposing the bond on a replacement satellite license that was granted before the bond rule became effective, the International Bureau acted in violation of these clear

¹⁰ First Report and Order, ¶ 276 and n. 686 (citing *DirecTV, Inc. v. FCC*, 110 F.3d 816, 825-26 (D.C.Cir. 1997); *Landgraf v. USI Film Products*, 511 U.S. 244, 280 (1994)).

¹¹ *Id.*

¹² First Report and Order, ¶ 283 (emphasis in original).

¹³ First Order on Reconsideration, ¶ 55.

directives in the First Report and Order, directives that are based on established retroactivity precedent.

The Bureau's imposition of the bond, without discussion or analysis, in a grant stamped license modification in this case also clearly fails to satisfy the substantive criteria for retroactive application of new rules set forth by the Commission because the bond does "impose new duties on applicants with respect to transactions already completed." In the First Report and Order the Commission concluded that application of the bond rule would not "impose new duties" on applicants for new satellite licenses "with respect to transactions already completed" because merely filing an application for a new satellite license could not be considered a completed transaction as such applicants have not yet been granted space station licenses. But here the Bureau did impose a new duty on Loral with respect to a "transaction already completed" by making Loral's 2001 Replacement Authorization subject to the bond requirement that became effective on September 20, 2004. It is indisputable that imposition of a multi million-dollar bond on existing licensees clearly imposes significant new duties and burdens on their licenses – the "transactions already completed." The Bureau's imposition of the bond on Loral's 2001 Replacement Authorization, has had an effect that the Commission specifically sought to avoid: an existing licensee, Loral, has been burdened with a requirement to spend considerable money on implementation of a \$3 million dollar bond with respect to a license for a replacement satellite that the Commission granted long before the bond rule became effective.

Had the Commission intended to apply the bond to existing satellite licensees or existing satellite replacement licenses with modification requests pending at the time that

the bond rule became effective, the Commission would have had to consider and justify the burden that the bond would impose on an existing licensee. That the Commission failed to even mention such a case, let alone analyze or justify it, supports the proposition that the Commission carefully limited retroactive application of the bond rule to pending applications for new satellites, the only type of pending applications that it specifically determined should be subject to the bond rule.

Additional evidence of the Commission's intent to apply the bond only to new satellite applications can be found in its assumption that the only pending satellite applications to which its new rules would apply would be those filed in processing rounds in which the Commission's fungibility policy applied.¹⁴ The Commission noted that such applicants for new satellite licenses could not have reasonably assumed they would be granted any authority if mutually exclusive applications were filed. Of course this assumption does not apply to the Bureau's application of the bond to a preexisting replacement authorization since the former fungibility policy and processing rounds applied only to new space station applications and not to a modification application to an existing authorization for a satellite intended to replace a licensee's operational satellite at a particular orbital slot. Had the Commission intended to apply the bond rule to license modification applications for existing replacement satellite licenses it would have to have considered this as an exception, not covered by the fungibility/processing round rationale discussed above. Unlike applicants that filed in processing rounds to which the fungibility policy applied, Loral reasonably had an expectation that its modification request for its existing 2001 Replacement Authorization would be granted at 37.5° W.L.,

¹⁴ First Report and Order, ¶ 277.

as the application was not filed in the context of a processing round and fungibility policy was not applicable.

It is telling that the only specific applications that the Commission determined should be covered by the new licensing rules were new satellite applications filed in the V-band and Ka-NGSO processing rounds.¹⁵ The Commission directed the International Bureau to review other pending applications consistent with the considerations discussed above.¹⁶ In its grant-stamped Telstar 11R Modification the Bureau failed to even discuss, let alone justify, retroactive imposition of the bond or how such action could satisfy the Commission's retroactivity criteria in light of the obvious burden that the bond imposes on Loral's preexisting 2001 Replacement Authorization. Nor did the Bureau even attempt to explain how imposing the bond now would expedite service or discourage speculation with respect to a replacement satellite previously granted to a licensee already operating a satellite in the same orbital location.

Moreover, the Bureau's action cannot be justified under the theory that in granting Loral's modification request it issued a new replacement license that included extended Ku-band. The Commission had already granted the 2001 Replacement License and its 2001 Modification Request was just that: a modification request and not a "new" replacement license. Further, that the bond imposed a new duty and onerous obligation on Loral's existing Telstar 11R license is clear, even if the Bureau's Telstar 11R Modification Grant could be deemed to be a new satellite license by virtue of the grant of authority to operate in the extended Ku-band. The Bureau's action still has the

¹⁵ First Report and Order, ¶¶ 279-281.

¹⁶ First Report and Order, ¶ 284.

consequence of burdening the 2001 Replacement Authorization because both the Ku-band and extended Ku-band payloads will be on the same satellite. Thus, the retroactive effect of the bond on the 2001 Replacement Authorization is inescapable and the burden it imposes is not lessened and therefore should not be justified even if the Telstar 11R Modification could be read as an additional or separate space station license pursuant to Section 25.165 and the revised definition of replacement satellites to exclude those with authorizations to operate in extended bands.

In addition, in the First Order on Reconsideration, in which the Commission determined for the first time to apply the bond requirement to replacement satellites that are authorized to use extended bands,¹⁷ the brief discussion by which the Commission reaffirmed its decision to apply the bond rule to applications pending at the time that the bond rule became effective did not include any analysis of how imposing the bond on a pending modification request to an existing replacement authorization could satisfy the established retroactivity criteria, discussed above.¹⁸ The absence of any such discussion or analysis further supports Loral's position that the Commission did not intend for the Bureau to impose the bond requirement retroactively upon replacement satellite authorizations granted prior to September 20, 2004.

IV. EVEN IF THE COMMISSION FAILS TO RESCIND THE BOND REQUIREMENT, IT SHOULD GRANT LORAL'S REQUEST FOR A WAIVER OF SECTION 25.165(A) OF THE COMMISSION'S RULES

In the event that the Commission determines to uphold the imposition of the bond requirement in this case, Section 25.165(a) of the Commission's rules, Loral requests a

¹⁷ First Order on Reconsideration, ¶¶ 54-59.

¹⁸ First Order on Reconsideration, ¶¶ 71-72.

waiver of the requirement. The Commission's rules provide for waivers of any rule, provided that the petitioner shows good cause for the request.¹⁹

In the First Report and Order the Commission stated that it would consider requests for complete or partial waivers of the bond requirement for satellite operators proposing satellites that would provide public safety services.²⁰ Loral intends to provide public safety services on Telstar 11R as it has done for years on its Telstar satellites. Loral has consistently provided a range of public safety services on Telstar 11 and other Telstar satellites on both a long and short term basis. Such public safety services have included provision of data and video capacity for the U.S. and state and local government entities to assist with air traffic control, disaster recovery services, and certain military operations. Telstar FSS capacity has been used to help FEMA provide communications services for forest fire fighting operations and for emergency relief services for victims of hurricanes and floods, and to help the Federal Aviation Administration to provide aviation safety. Telstar satellites provided capacity used extensively to provide public safety services in connection with the horrific attacks of September 11, 2001 and later for public safety services provided by the Department of Homeland Security. Telstar 11R is designed to continue to provide such public safety services, and Loral intends to provide these services on the satellite. For that reason, Loral requests a waiver of the bond requirement.

Loral also remains in a Chapter 11 reorganization that began last year and seeks waiver of the bond rule based on financial hardship as evidenced by its bankruptcy

¹⁹ 47 C.F.R. § 1.3

²⁰ First Report and Order, ¶ 169.

proceeding. On October 22, 2004, the Commission granted Loral a waiver for all of its 2004 regulatory fees based on the financial hardship that precipitated Loral's Chapter 11 filing.²¹ In granting its waiver the Commission restated that "it will grant waivers of its regulatory fees on a sufficient showing of financial hardship, and evidence of bankruptcy or receivership is sufficient to establish financial hardship."²² The Commission determined that Loral had submitted evidence establishing that it had commenced Chapter 11 proceedings on July 15, 2003 and therefore the Commission granted the waiver request in full.²³ As Loral remains in Chapter 11, it requests a waiver of the rule based on its continuing financial hardship.

The costs of maintaining the bond are significant for Loral and waiver of the bond requirement will assist Loral in its plan to successfully emerge from Chapter 11 by reducing its costs. This will help Loral proceed more quickly to complete construction and launch Telstar 11R, expediting service to the public including the critical public safety services that have traditionally been provided using Loral's Telstar satellites.

Loral also merits grant of a request for waiver in light of the unique circumstances in this case. Should the Commission reject Loral's Petition for Reconsideration and retain the bond requirement, this would be the first time that the bond was effectively imposed via a modification request by a licensee, Loral, that held its replacement license long before the bond rule was even proposed, yet alone implemented. As discussed

²¹ Letter from Mark A. Reger to Philip L. Verveer (Oct. 22, 2004) Re: Request for Waiver of Fiscal Year (FY) 2004 Regulatory Fees for Loral SpaceCom Corporation (Debtor-In-Possession), Loral Orion, Inc. (Debtor-In-Possession), and Loral Skynet Network Services, Inc. (Debtor-In-Possession) (Control No. 00000RROG-04-069).

²² *Id.*

²³ *Id.*

above,²⁴ even if the Commission determines that the Bureau had authority to impose the bond because it deems the 2001 Modification Grant to be a new authorization for extended Ku-band under the revised bond rule that took effect on September 20, 2004, Loral's preexisting 2001 Replacement Authorization is inescapably and retroactively burdened with the costs of the bond.

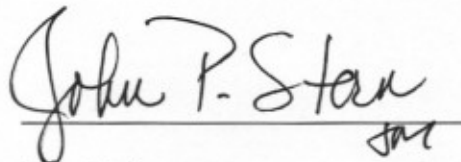
Finally, Loral's 2001 Modification Request to add extended Ku-band frequencies was filed on November 30, 2001. It was unopposed. Nevertheless, the Bureau did not grant the modification request until September 28, 2004, nearly three years later and only eight days following the effective date of the revised bond rule which the Bureau cites for authority to impose the bond. Even if the Commission were to reject Loral's arguments that the bond does not apply in this case, equity supports waiver of the bond given the unusually long time during which Loral's unopposed modification request was pending followed by almost immediate action following the effective date of the revised bond requirement.

²⁴ See discussion at pages 10-11

V. CONCLUSION

For all of the reasons discussed above, Loral requests that the Commission reconsider and rescind or delete its imposition of the bond requirement attached as condition (2)(e) to the Telstar 11R Modification Grant. In the alternative, Loral requests that the Commission grant its request for a waiver of application of the bond requirement for good cause.

Respectfully submitted,

A handwritten signature in cursive script that reads "John P. Stern". The signature is written in dark ink and is positioned above a horizontal line. To the right of the line, there is a small, stylized mark that appears to be the initials "JS".

John P. Stern
Deputy General Counsel
Loral Space & Communications Ltd.
(Debtor-In-Possession)
600 Third Avenue
New York, New York 10016
(212) 338-5228

November 1, 2004

CERTIFICATE OF SERVICE

I, Dennette Manson, do hereby certify that on this 1st day of November 2004, copies of the foregoing Petition For Partial Reconsideration And Request For Waiver were delivered by hand, unless otherwise indicated, to the following parties:

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Thomas S. Tycz, Acting Chief
Satellite and Radiocommunication Division
International Bureau
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Fern J. Jarmulnek, Chief
Satellite Policy Branch
Satellite and Radiocommunication Division
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Robert Nelson, Chief
Engineering Branch
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Steven Spaeth, Legal Advisor
Office of the Bureau Chief
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554


Dennette Manson