

STEPTOE & JOHNSON^{LLP}

ATTORNEYS AT LAW

Pantelis Michalopoulos
202.429.6494
pmichalo@steptoe.com

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
Tel 202.429.3000
Fax 202.429.3902
steptoe.com

October 1, 2009

Via ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
12th Street S.W.
Washington, D.C. 20554

Re: Motion for Stay of International Bureau Order DA 09-1850, Call Signs S2346, S2680, S2681, S2682, and S2683

Dear Ms. Dortch:

AtContact Communications, LLC (“AtContact”), through its undersigned counsel, submits this letter to highlight the urgency of granting the above-referenced Motion for Stay by Friday, **October 2, 2009**.

The attached letter from Safeco Insurance Company of America (“Safeco”) explains that it intends to act on the Commission’s instructions to forfeit AtContact’s bond if a stay is not granted or the Commission has not agreed to withdraw its instructions pending the resolution of AtContact’s Petition for Reconsideration of the Bureau’s Order by Friday, October 2, 2009. In addition, AtContact has received a letter from the FCC’s Chief Financial Officer Mark Stephens, dated October 1, 2009, demanding Safeco provide the bond payment by October 5, 2009.¹

As demonstrated in AtContact’s Motion for Stay, the forfeiture of this bond will cause severe irreparable injury for AtContact and its current and future customers – AtContact’s current service to Alaska and other areas would be directly threatened; and its two requests for stimulus funds for next-generation

¹ Letter from Mark Stephens, Chief Financial Officer, FCC, to Bruce Echigoshima, Safeco Insurance Company of America (Oct. 1, 2009). Irrespective of the date used as a payment deadline, the urgency of granting a stay applies.

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satellite broadband service would be frustrated along with a private equity commitment of many tens of millions of dollars that is premised on the receipt of stimulus funds. Equally important, AtContact's irreparable injury is not offset by any injury to any other party or to the public, as the Treasury Department's claim to the bond will remain secured pending a decision on its Petition for Reconsideration.

We urge the Commission to grant the Motion for Stay before the surety's stated deadline so that AtContact's bond is not forfeited while its Petition for Reconsideration is being considered on the merits.

Pursuant to 47 C.F.R. § 1.1206(b), this notice is being filed electronically with copies emailed to Commission staff that have participated in ex parte discussions on this matter.

Respectfully submitted,

/s/

Pantelis Michalopoulos
Philip L. Malet
Christopher Bjornson
L. Lisa Sandoval
*Counsel for AtContact Communications,
LLC*

Attachment

Cc:
Paul Cascio
Angela Giancarlo
Dan Harrold
David Horowitz
Erin McGrath
Robert Nelson
Grey Pash
Roderick Porter
Austin Schlick
Jennifer Schneider
Cassandra Thomas



Liberty Mutual Surety

BRUCE S. ECHIGOSHIMA

WESTERN REGION SURETY CLAIMS
P.O. Box 34670 Seattle, WA 98124
Phone: (206) 545-5000

September 30, 2009

OVERNIGHT MAIL
FAXED TO: (303) 723-553

Jenny Palasz
Director, Treasury & Risk Management
Dish Network, LLC
2539 North Highway 67
Sedalia, CO 80135

cc: Pantelis Michalopoulos
1330 Connecticut Avenue NW
Washington, DC 20036

FAXED TO: (202) 429-3902

Re: Principal: contactMEO Communications, LLC
Bond No.: 6321647
Obligee: United States Treasury
Claim: Notice of Default

Dear Ms. Palasz:

We are in receipt of copies of copies of the Redacted Petition for Reconsideration and Redacted Motion for Stay which were both filed on September 21, 2009. While we understand that this matter is under review by the FCC we do need to confirm the status of this matter at this time. As you will recall a demand was made upon the bond late in August and Safeco has thirty (30) days from the demand to respond. We calculate that our response is due on or about October 9, 2009.

As was stated in my FAX to you of September 9 Safeco must receive confirmation in writing from the FCC that they have agreed to withdraw the claim pending the resolution of the administrative and/or court proceedings. In the alternative, you can provide evidence that you have obtained a protective order from a court of competent jurisdiction that specifically provides that the surety is excused from not paying until the proceedings have been concluded. This information must be in our office by the close of business on October 2, 2009 or we will be forced to proceed as is required under the bond.

If you have any questions, please feel free to contact me at the number and address listed above or by FAX. My FAX number is (425) 376-8636.

Thank you.

Very truly yours,

SAFECO INSURANCE COMPANY OF AMERICA

Bruce S. Echigoshima
Surety Claims

cc: James M. Talens - 6017 Woodley Road, McLean, VA 22101

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