

GURMAN, KURTIS, BLASK & FREEDMAN

CHARTERED

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WASHINGTON, D.C. 20036

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April 29, 1991

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DANIEL E. SMITH  
ANDREA S. MIANO\*

\* NOT ADMITTED IN D.C.

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OF COUNSEL

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CONSULTING ENGINEERS

FEDERAL COMMUNICATIONS  
COMMISSION  
OFFICE OF THE  
SECRETARY

Apr 29 '91

RECEIVED

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Dear Ms. Searcy:

On behalf of AMSC Subsidiary Corporation, enclosed please find an original and one (1) copy of an updated FCC Form 430 for that entity.

Should you have any questions or require additional information concerning this submission, please contact undersigned counsel.

Sincerely,

*William D. Freedman*  
William D. Freedman

Enclosure

FCC  
430

FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

ADDI  
SUBD-0105  
Expires 3/31/90

COMMON CARRIER AND SATELLITE RADIO LICENSEE  
QUALIFICATION REPORT

See reverse side for information  
regarding Public Burden Statement

INSTRUCTIONS

- 1. The "Filer" of this report is defined to include (1) An applicant, where this report is submitted in connection with applications for common carrier and satellite radio authority as required for such applications, or (2) A licensee or permittee, where this report is required by the Commission's Rules to be submitted on an annual basis.
- 2. Submit an original and one copy (for originals only) to the Federal Communications Commission, Washington, DC 20554. If more than one radio service is listed in Item 8, submit an additional copy for each such additional service. If this report is being submitted in connection with an application for radio authority, attach it to that application.
- 3. Do not submit a fee with this report.

1. Business Name and Address (Number, Street, State and ZIP Code) of Filer's Principal Office:  AMSC Subsidiary Corporation 1150 Connecticut Avenue, N.W., Fourth Floor Washington, D.C. 20036	2. (Area Code) Telephone Number: (202) 331-5858 3. If this report supercedes a previously filed report, specify its date: February 27, 1991
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4. Filer is (check one): <input type="checkbox"/> Individual <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Other (Specify):	5. Under the laws of what State (or other jurisdiction) is the Filer organized? Delaware
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6. List the common carrier and satellite radio services in which Filer has applied or is a current licensee or permittee:

Mobile Satellite Service  
Aeronautical Mobile Satellite Service (R)

7(a) Has the Filer or any party to this application had any FCC station license or permit revoked or had any application for permit, license or renewal denied by this Commission? # 715, attach as Exhibit I a statement giving full date and file number of license or permit revoked and relating circumstances.  Yes  No

7(b) Has any court finally adjudged the Filer, or any person directly or indirectly controlling the Filer, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement, or other means of unfair methods of competition? # 715, attach as Exhibit II a statement relating the facts.  Yes  No

7(c) Has the Filer, or any party to this application, or any person directly or indirectly controlling the Filer ever been convicted of a felony by any state or Federal Court? # 715, attach as Exhibit III a statement relating the facts.  Yes  No

7(d) Is the Filer, or any person directly or indirectly controlling the Filer, presently a party in any matter referred to Items 7(b) and 7(c)? # 715, attach as Exhibit IV a statement relating the facts.  Yes  No

8. Is the Filer, directly or indirectly, through stock ownership, contract or otherwise, currently interested in the ownership or control of any other radio stations licensed by this Commission? # 715, attach as Exhibit V the case of each such licensee and the licensee's relation to the Filer.  Yes  No

9. Filer is an individual (sole proprietorship) or partnership, answer the following and Item 11:

10. Full Legal Name and Residential Address (Number, Street, State and ZIP Code) of Individual or Partners:	11. (b) Is individual or each member of a partnership a citizen of the United States? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	(c) Is individual or any member of a partnership a representative of an alien or of a foreign government? <input type="checkbox"/> Yes <input type="checkbox"/> No

If filer is a corporation, answer the following and Item 11:

10(a) Attach as Exhibit VI the names, addresses, and citizenship of those stockholders owning of record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries.

(b) List below, or attach as Exhibit VII the names and addresses of the officers and directors of the Filer.

(c) Is the Filer directly or indirectly controlled by any other corporation?

If "YES", attach as Exhibit VIII a statement (including organizational diagrams where appropriate) which fully and completely identifies the nature and extent of control. Include the following: (1) the address and primary business of the controlling corporation and any intermediate subsidiaries; (2) the names, addresses, and citizenship of those stockholders holding 10 percent or more of the controlling corporation's voting stock; (3) the approximate percentage of total voting stock held by each such stockholder; and (4) the names and addresses of the president and directors of the controlling corporation.

Yes  No

(d) Is any officer or director of the Filer an alien?

Yes  No

(e) Is more than one-fifth of the capital stock of the Filer owned of record or voted by aliens or their representatives, or by a foreign government or representative(s) thereof, or by a corporation organized under the laws of a foreign country?

Yes  No

(f) Is the Filer directly or indirectly controlled: (1) by any other corporation of which any officer or more than one-fourth of the directors are aliens, or (2) by any foreign corporation or corporation of which more than one-fourth of the capital stock is owned or voted by aliens or their representatives, or by a foreign government or representatives thereof.

Yes  No

(g) If any answer to questions (d), (e) or (f) is "YES", attach as Exhibit IX a statement identifying the aliens or foreign entities, their nationality, their relationship to the Filer, and the percentage of stock they own or vote.

#### 11. CERTIFICATION

This report constitutes a material part of any application which cross-references it, and all statements made in the attached exhibits are a material part thereof. The ownership information contained in this report does not constitute an application for, or Commission approval of, any transfer of control or assignment of radio facilities. The undersigned, individually and for the Filer, hereby certifies that the statements made herein are true, complete and correct to the best of Filer's knowledge and belief, and are made in good faith.

WILLFUL FALSE STATEMENTS MADE ON THIS APPLICATION ARE PUNISHABLE BY FINE AND IMPRISONMENT (US Code, Title 18, Section 1001) and/or REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (US Code, Title 47, Section 312(a)(1)).	Date	Fir. (Must correspond with that shown in Item 1)	Type or Printed Name
	4/26/91	AMSC Subsidiary Corporation	Leslie A.L. Borden
	Signature		Title
	<i>Leslie A. Borden</i>		Secretary

#### NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT OF 1974 AND THE PAPERWORK REDUCTION ACT OF 1980

No collection of personal information requested in this form is to determine if you are qualified to become or remain a licensee in a common carrier or exchange radio service pursuant to the Communications Act of 1934, as amended. No authorization can be granted unless all information requested is provided. Your response is required to obtain the requested authorization or reach an authorization.

Public reporting burden for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Federal Communications Commission, Office of Managing Director, Washington, DC 20554, and to Office of Management and Budget, Paperwork Reduction Project (0600-0106), Washington, DC 20503.

AMSC Subsidiary Corporation  
FCC Form 430

EXHIBIT III

FELONY CONVICTIONS  
(Response to Item 7(c))

Filer is a wholly-owned subsidiary of American Mobile Satellite Corporation, one of whose shareholders is Hughes Communications Mobile Satellite Services, Inc., ("Hughes"). A statement relating the specific facts regarding the conviction in question may be found in the FCC Form 430 of Hughes filed with the Commission on August 7, 1990.

EXHIBIT VI

STOCKHOLDERS OF FILER  
(Response to Item 10(a))

One hundred percent (100%) of the stock of Filer is held by American Mobile Satellite Corporation, a Delaware corporation, the address of which is 1150 Connecticut Avenue, N.W., Fourth Floor, Washington, D.C. 20036.

EXHIBIT VII

OFFICERS AND DIRECTORS OF FILER  
(Response to Item 10(b))

The following are the names and addresses of the officers and directors of Filer.

<u>Name/Address</u>	<u>Position</u>
Brian B. Pemberton American Mobile Satellite Corporation 1150 Connecticut Ave., N.W. Washington, D.C. 20036	President
Leslie A.L. Borden American Mobile Satellite Corporation 1150 Connecticut Ave., N.W. Washington, D.C. 20036	General Counsel; Corporate Secretary
Christopher R. McCleary American Mobile Satellite Corporation 1150 Connecticut Ave., N.W. Washington, D.C. 20036	Vice President - Sales and Marketing
Robert A. Kerstein American Mobile Satellite Corporation 1150 Connecticut Ave., N.W. Washington, D.C. 20036	Vice President - Finance/ Chief Financial Officer; Treasurer
Francois Giorgio American Mobile Satellite Corporation 1150 Connecticut Ave., N.W. Washington, D.C. 20036	Vice President - Engineering and Operations
Fred J. Judge Hughes Communications Mobile Satellite Services, Inc. 1900 East Grand Avenue Building SC/S64/B430 El Segundo, California 90245	Director

Name and Address

Title

Jai P. Bhagat  
Mtel Space Technologies, L.P.  
200 South Lamar Street  
Security Centre, South Building  
Jackson, Mississippi 39201

Director

Andrew A. Quartner  
McCaw Cellular Communications, Inc.  
1250 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Director

EXHIBIT VIII

CONTROLLING CORPORATION  
(Response to Item 10(c))

As noted in Exhibit VI hereto, one hundred percent of the stock of Filer is held by American Mobile Satellite Corporation, a Delaware corporation, the address of which is 1150 Connecticut Avenue, N.W., Fourth Floor, Washington, D.C. 20036. The primary business of American Mobile Satellite Corporation is mobile satellite communications.

The following is a list of the shareholders holding twenty percent (20%) or more of the stock of American Mobile Satellite Corporation,<sup>1/</sup> each of which holds an approximate 25.4 percent interest in the company, and their respective addresses and primary businesses.

Hughes Communications  
Mobile Satellite Services, Inc.  
1900 East Grand Avenue  
Building SC/S64/B430  
El Segundo, California 90245  
(Satellite Telecommunications)

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<sup>1/</sup> It should be noted that McCaw Space Technologies, Inc. ("McCaw SpaceTech"), Satellite Mobile Telephone Company L.P. ("SMTCLP") and Transit Communications, Inc. ("Transit") each holds an approximate 8.47% interest in American Mobile Satellite Corporation. McCaw Cellular Communications, Inc., which wholly-owns McCaw SpaceTech, also holds approximately 52% of the stock of LIN Broadcasting Corporation, the parent of LIN Satellite Communications Corporation ("LIN SCC"). LIN SCC is an 80% general partner in SMTCLP and is the holder of 80% of the stock of Transit.



Mtel Space Technologies, L.P.  
200 South Lamar Street  
Security Centre, South Building  
Jackson, Mississippi 39201  
(Satellite Telecommunications)

The names and addresses of the President and the directors of American Mobile Satellite Corporation, all of whom are U.S. citizens, are:

<u>Name/Address</u>	<u>Position</u>
Brian B. Pemberton American Mobile Satellite Corporation 1150 Connecticut Avenue, N.W. Washington, D.C. 20036	President
Carson E. Agnew Hughes Communications Mobile Satellite Services, Inc. 1900 East Grand Avenue Building SC/S64/B430 El Segundo, California 90245	Director
J. Robert Fugate Mobile Telecommunication Technologies Corp. 1633 Winchester Street Jackson, Mississippi 39211	Director
C. Victor Raiser, II Mobile Telecommunication Technologies Corp. 1450 G Street, N.W. Washington, D.C. 20005	Director
John Palmer Mobile Telecommunication Technologies Corp. 200 South Lamar Street Security Centre, South Building Jackson, Mississippi 39201	Director
John C. Baker Alan Patricof Associates 545 Madison Avenue, 15th Floor New York, New York 10022	Director
Jai P. Bhagat Mtel Space Technologies, L.P. 200 South Lamar Street Security Centre, South Building Jackson, Mississippi 39201	Director

Name/Address

Position

J. Shelby Bryan  
Millicom, Inc.  
153 East 53rd Street  
Suite 5500  
New York, New York 10022

Director

Gary K. Noreen  
Transit Communications Inc.  
1167 North Holliston Avenue  
Pasadena, California 91104

Director

Billy J. Parrott  
Satellite Mobile Telephone  
Company, L.P.  
57 East 11th Street  
New York, New York 10003

Director

Andrew A. Quartner  
McCaw Cellular Communications, Inc.  
1250 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Director

Albert L. Zesiger  
BEA Associates, Inc.  
One Citicorp Center  
153 East 53rd Street, 58th Floor  
New York, New York 10022

Director

Fred J. Judge  
Hughes Communications Mobile Satellite  
Services, Inc.  
1900 East Grand Avenue  
Building SC/S64/B430  
El Segundo, California 90245

Director

Kevin McGrath  
Hughes Communications Mobile Satellite  
Services, Inc.  
1900 East Grand Avenue  
Building SC/S64/B430  
El Segundo, California 90245

Director

Stephen J. Petrucci  
Hughes Communications Mobile Satellite  
Services, Inc.  
1900 East Grand Avenue  
Building SC/S64/B430  
El Segundo, California 90245

Director

Name/Address

Position

Wayne Perry  
McCaw Cellular Communications, Inc.  
5400 Carillon Point  
Kirkland, Washington 98033

Director

CERTIFICATE OF SERVICE

I, Lilly A. Redd, a secretary in the law offices of Gurman, Kurtis, Blask & Freedman, Chartered, do hereby certify that on this 8th day of May, 1991, a copy of the foregoing "OPPOSITION TO PETITION FOR RECONSIDERATION" was sent by U.S. first class mail, postage prepaid to:

Chairman Alfred C. Sikes \*  
Federal Communications Commission  
Room 814  
1919 M Street, N.W.  
Washington, D.C. 20554

Commissioner James H. Quello \*  
Federal Communications Commission  
Room 802  
1919 M Street, N.W.  
Washington, D.C. 20554

Commissioner Sherrie P. Marshall \*  
Federal Communications Commission  
Room 826  
1919 M Street, N.W.  
Washington, D.C. 20554

Commissioner Andrew C. Barrett \*  
Federal Communications Commission  
Room 844  
1919 M Street, N.W.  
Washington, D.C. 20554

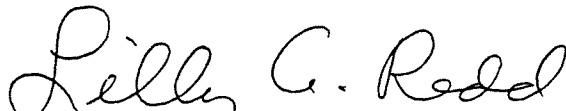
Commissioner Ervin S. Duggan \*  
Federal Communications Commission  
Room 832  
1919 M Street, N.W.  
Washington, D.C. 20554

Richard H. Firestone \*  
Chief, Common Carrier Bureau  
Federal Communications Commission  
Room 500  
1919 M Street, N.W.  
Washington, D.C. 20554

Cecily C. Holiday \*  
Chief, Satellite Radio Branch  
Common Carrier Bureau  
Federal Communications Commission  
Room 6324  
2025 M Street, N.W.  
Washington, D.C. 20554

Renee Licht, Esq. \*  
Deputy General Counsel  
Federal Communications Commission  
Room 614  
1919 M Street, N.W.  
Washington, D.C. 20554

William E. Zimsky, Esq.  
Taylor & Zimsky  
900 17th Street, N.W.  
Suite 900  
Washington, D.C. 20006  
(Counsel for Mobile Satellite  
Services, Inc.)

  
\_\_\_\_\_  
Lilly A. Redd

\* Hand Delivered