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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

June 23, 1999  
Received

JUN 25 1999

Satellite Policy Branch  
International Bureau

**BY HAND DELIVERY**

John I. Riffer  
Assistant General Counsel  
Administrative Law Division  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, DC 20554

INTL. REFERENCE CENTER  
JUN 25 4 24 PM '99

Re: Application of Mobile Communications Holdings, Inc., File Nos. 17-DSS-P-91(6); 18-DSS-P-91(18); 11-SAT-LA-95; 12-SAT-AMEND-95; 18-SAT-AMEND-96

Dear Mr. Riffer:

This letter is submitted on behalf of Mobile Communications Holdings, Inc. ("MCHI") to supplement its October 19, 1998 and December 23, 1998 submissions responding to the Office of General Counsel's August 19, 1998 request for information. MCHI has recently learned of additional information which should not affect the General Counsel's prior determination that no violation of the Commission's *ex parte* rules had taken place. However, we are writing to correct a factual error contained in MCHI's prior submission.

The General Counsel's August 19, 1998 letter requested information, *inter alia*, pertaining to a May 8, 1996 letter from David Thompson of Spectrum Astro to Kate Carr, Special Assistant to the President. In its October 19 submission, MCHI stated that MCHI had not solicited or encouraged Mr. Thompson to write the letter to Ms. Carr, and that it did not become aware that Mr. Thompson had written a letter to Ms. Carr until it was advised of this fact by the FCC. MCHI has recently learned that Mr. Helman saw and reviewed a draft of the

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letter from Mr. Thompson to Ms. Carr. Mr. Helman does not recall communicating with Mr. Thompson on this subject although he has recently seen a copy of the draft letter with his handwritten comments, raising a question in his mind as to the nature and extent of his involvement with this letter and whether he may have asked Mr. Thompson to use his contacts to support a change in policy issues such as the FCC's financial qualification standards. Although MCHI does not believe that these facts are material to the question of whether MCHI had violated the Commission's ex parte rules, MCHI is providing this information to the Commission to clarify Mr. Helman's and MCHI's prior statements concerning this matter.

We have enclosed an amended declaration from Gerald Helman, which contains the information provided in this submission.

Please do not hesitate to call us if you have any questions or concerns.

Respectfully submitted,



Eric L. Bernthal  
Teresa D. Baer  
Minh N. Vu  
of LATHAM & WATKINS

Counsel to Mobile Communications  
Holdings, Inc.

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

_____ )	
In the Matter of )	
Application of Mobile Communications )	File Nos. 11-DSS-P-91(6); 18-DSS-
Holdings, Inc. )	P-91(18); 11-SAT-LA-95; 12-SAT-
_____ )	AMEND-95; 158-SAT-AMEND-96

**SUPPLEMENTAL DECLARATION OF GERALD B. HELMAN**

I, Gerald B. Helman, hereby declare as follows:


1. I am the Vice President, International and Governmental Affairs of Mobile Communications Holdings, Inc. ("MCHI"). I have held this position since 1993. My responsibilities at MCHI include the direction and supervision of the company's government relations activities.

2. On October 19, 1998, I executed a declaration in connection with the above-referenced proceeding in which I stated that I was not aware that David Thompson of Spectrum Astro had written a letter to Kate Carr, Special Assistant to the President, until the FCC sent MCHI a copy of the letter at the same time that the other parties to this proceeding were served. I had also stated that MCHI had not solicited or encouraged Mr. Thompson to send the letter to Ms. Carr. At the time I prepared the October 19 declaration, I had no recollection of having seen this letter before it was sent to MCHI by the FCC, nor did I recall that I ever asked Mr. Thompson to send this letter to Ms. Carr. I still have no such recollection.

3. However, I have recently seen a draft of Mr. Thompson's letter which indicates that I reviewed and commented on the letter. This raises questions in my mind as to the nature and extent of my involvement with this letter, and whether I may have encouraged Mr.

Thompson to use his contacts to advocate a change in policy issues such as the FCC's treatment of small businesses as evidenced by the FCC's financial qualification standards. I still have no specific recollections of this matter, however. Accordingly, I wish to amend my earlier statement to this limited extent.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 23, 1999.

  
Gerald B. Helman