

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

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JAN 13 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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In the matter of))
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Amendment to Application of))
Motorola Satellite Communications, Inc.))
to Construct, Launch and Operate))
a Low Earth Orbit Satellite System))
))
Amendment to Application of))
TRW, Inc.))
to Construct))
a Non-Geostationary Satellite System))
in the Mobile-Satellite Service Above 1 GHz))
_____))

File Nos. 15-SAT-LA-95;
16-SAT-AMEND-95

File Nos. 17-SAT-LA-95;
18-SAT-AMEND-95

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JAN 18 1995

Satellite and Radiocommunication Division
Satellite Policy Branch

MOTION FOR LEAVE TO FILE A REPLY

Hughes Communications Galaxy, Inc. ("HCG") hereby requests leave to file a Reply pursuant to Section 1.45(c) of the Commission's rules. Grant of HCG's motion will serve the public interest because it will ensure that the record in this matter is both complete and accurate.

Although the pleading schedule on satellite applications usually consists of three stages -- comments or petitions, oppositions, and replies (see 47 CFR § 25.154), the Commission provided for an abbreviated pleading schedule in its November 21, 1994 Public Notice (Report No. DS-1481) that does not automatically provide for the filing of replies by the party who originally filed comments or oppositions.

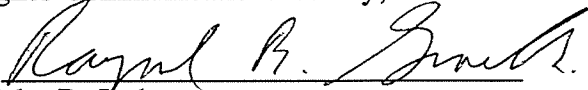
HCG requests leave to file a Reply that otherwise is permitted by the Commission's rules because TRW's Consolidated Opposition and Reply Comments filed on January 3, 1995 raise substantial new procedural issues.^{1/}

TRW has alleged that HCG's Comments should be disregarded because TRW's request for conditional licensing of Ka band feeder links is protected by a cut-off notice and that HCG's pending Ka band Spaceway application was not filed by a purported cut-off date. TRW is wrong on the facts and the law. HCG should be afforded an opportunity to respond to this procedural attack on the status of HCG's Spaceway application.

HCG respectfully requests that the Commission accept the attached Reply in order to provide a complete and accurate record on which to fully consider the legal and factual issues raised by TRW. See Telefonica Larga Distancia De Puerto Rico, 9 FCC Rcd 4041, 4043 & n. 15 (1994) (full Commission granted leave to file response to reply comments that raised new arguments and new factual assertions).

Respectfully submitted,

Hughes Communications Galaxy, Inc.

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January 13, 1995

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1. HCG filed Comments on December 22, 1994. TRW served its Consolidated Opposition and Reply Comments on HCG by regular mail on January 3, 1993. This motion and the attached Reply of HCG are being filed within the five-day period for submitting replies provided by Sections 25.154(d) and 1.45(b) of the Commission's rules.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13th day of January, 1995, a true and correct copy of the foregoing Motion for Leave to File A Reply was served by first class mail, postage prepaid, upon the following:

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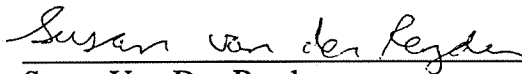
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