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JAN 16 1996

Law Offices

Hartke & Hartke

The Hartke Building

7637 Leesburg Pike

Falls Church, Virginia 22043

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Washington, D.C. Area

Telephone:

(703) 734-2810

Fax: (703) 790-5455

Vance Hartke
U.S. Senator, Ret.
Wayne Hartke
Paul V. Hartke
Keith Hartke
Office Manager

January 16, 1996

Mr. Thomas S. Tycz
Chief, Satellite and
Radiocommunication Division
Room 811
2000 M Street, N.W.
Washington, D.C.

54-DSS-DILA-90
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Re: Norris Satellite Communications, Inc.
Request for extension of time to respond.

Satellite Communications Branch
International Affairs

Dear Mr. Tycz:

I represent Norris Satellite Communications, Inc. ("Norris"), and I spoke today with Mr. Kensinger to determine the proper procedure for filing a request for extension at this time under these circumstances. I previously filed a letter request for an extension of time to be followed by a more detailed request after the government furlough was lifted, and someone was available to receive and act on the request for extension of time to respond.

The circumstances compelling this extension of time to respond are through no fault of Norris or its counsel. The timing of the FCC's letter was most inopportune. The letter was not received until just when everyone was unavailable due to the holidays, the government furlough was in effect, and thereafter the snow storm closed all remaining access to people and businesses.

Norris is merely requesting that it be given the effective amount of time which was originally stated in the FCC's letter, which is 30 days.

From December 18, 1995 there was no way to arrange for any meetings or discussions on how to respond to the request due to the holidays. It is typical of many in the aerospace field to take extended holiday vacations at this time of year. The necessary people at Norris needed to prepare a response have been unavailable, and they were gone by the time that I received the letter from the FCC.

It is not as if the Norris personnel have had notice of the FCC request to respond and then elected to take time off for the holidays. Instead, they did not receive the notice as they would ordinarily have in the ordinary course of business. Norris is merely asking for the period of time in which it is to respond to be consistent with the ordinary business days. Instead, we have faced the extraordinary events of the Christmas and New Year's holidays, combined with the government furlough, and compounded by the snow storm which has deprived Norris of any meaningful time to prepare its response.

Even this filing date of January 16 provides undersigned counsel effectively with only one day to prepare this request for extension. I have not had time to consult with my client or the necessary technical team to properly identify the amount of time needed to respond to the FCC request. Surely it is recognized that in normal business, one does not always reach another person on the first call. My telephone calls are repeatedly resulting only in reaching answering machines to leave messages, and it simply takes a reasonable amount of time for me to contact the principals to be able to submit an informed response.

The snow storm has complicated matters further by forcing undersigned counsel's trial calendar to be swamped, further constricting the available time to consult with my client to prepare a response.

Today I have two felony cases in Fairfax, Virginia which will occupy the rest of this day.

On Wednesday January 17, I have another trial in Manassas, Virginia which has been previously continued, and therefore any further continuance is unlikely.

On Thursday January 18, I have a trial in Arlington County, Virginia in the morning (involving threats of murder), followed by an afternoon trial in Fairfax, Virginia in which the County is seeking to take away the custody of a 6-month old child from her natural parents.

During the week of January 22-27, 1996 I have four trials scheduled, including the sentencing of a wife for her solicitation of another man to murder her husband. The seriousness of my cases demonstrates that significant time is needed for each case.

On Monday January 29, 1996 I have a major trial in Federal District Court in Alexandria, Virginia. This case involves witnesses from other states (Texas and Georgia), and may take several days.

In addition to the foregoing cases, I have four (4) trials that were continued due to the snow storm which still need to be re-set on my calendar. Two of these cases need to be heard on an urgent basis. They have not yet been re-set because the parties have not been able to meet and appear in Court due to the circumstances of the snow storm.

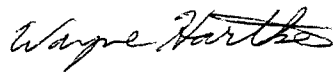
I am asking for a little professional courtesy in requesting the originally provided 30 day time frame to respond. These continuances of trial cases and unavailability of key individuals are unique conditions and justify some reasonable consideration in acting on this request for extension of time. Since this consolidation of cases during this time period is not due to any fault of Norris' undersigned counsel, it is reasonable to provide an extension of time which takes into account the unusually heavy workload.

There is no specific urgency involved in the timing of this response, although we are all concerned about the public resource at issue. While we want to timely respond to the FCC, it is consistent with due process notice to take into consideration the unique events that have deprived us at Norris of being

able to act within a reasonable business-day basis. Any perceived urgency must be balanced with providing a reasonable opportunity to prepare an informed response. It was the clear intent of the FCC to provide Norris with 30 days of time to prepare a response since that is the time stated in the FCC's letter. Norris is merely asking that those 30 days be an effective 30 days.

Therefore, Norris requests that it be given an extension for the originally requested 30 days for response, with the time beginning from today which is the effective beginning date when individuals are available.

Respectfully submitted,



Hartke & Hartke
By: Wayne Hartke

WH/bb
cc: client