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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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March 21, 1995

#### BY HAND DELIVERY

Mr. William F. Caton Secretary Federal Communications Commission 1919 M Street N.W., Room 222 Washington, D.C. 20554

Re: CTA Commercial Systems, Inc., 23-SAT-P/LA-95

E-Sat, Inc., 24-SAT-P/LA-95

Final Analysis Communication Services, Inc., 25-SAT-

P/LA-95

GE American Communications, Inc., 26-SAT-P/LA-95 Leo One USA Corporation, 57-DSS-P/LA-94(48), 27-SAT-

AMEND-95

Orbital Communications Corp, 28-SAT-MP/ML-95

Starsys Global Positioning, Inc., 31-DSS-AMEND-94, 32-

DSS-LA-94

Volunteers in Technical Assistance, 29-SAT-AMEND-95

Dear Mr. Caton:

Enclosed for filing is an original and four copies of the Motion for Extension of Time to File Replies of GE American Communications, Inc. Please return to our messenger a date-stamped copy of the enclosed (copy provided).

If you have any questions about this matter, please contact the undersigned.

Sincerely,

Julie T. Barton

**Enclosures** 

cc: Service List

(By Hand and First Class Mail)

BRUSSELS LONDON PARIS\* PRAGUE WARSAW

BALTIMORE, MD BETHESDA, MD COLORADO SPRINGS, CO DENVER, CO MCLEAN, VA

\*Affiliated Office

MAR 2 1 1995

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

OFFICE OF SECRETARY

In the Matter of	)	
Non-Voice, Non-Geostationary Low Earth Orbit Satellite Applications	)	
	) File Nos.	
CTA Commercial Systems, Inc.	) 23-SAT-P/LA-95	
E-Sat, Inc.	) 24-SAT-P/LA-95	
Final Analysis Communication Services, Inc.	) 25-SAT-P/LA-95 )	
GE American Communications, Inc.	) 26-SAT-P/LA-95	
Leo One USA Corporation	) 57-DSS-P/LA-94(48 ) 27-SAT-AMEND-95	,
Orbital Communications Corp.	) 28-SAT-MP/ML-95	
Starsys Global Positioning, Inc.	) 31-DSS-AMEND-94 ) 32-DSS-LA-94	1
Volunteers in Technical Assistance	) ) 29-SAT-AMEND-95	5

To: The Commission

### MOTION FOR EXTENSION OF TIME TO FILE REPLIES OF GE AMERICAN COMMUNICATIONS, INC.

GE American Communications, Inc. ("GE American"), by its attorneys, and pursuant to Section 1.46 of the Commission's Rules, hereby requests an extension of time to file replies to comments and petitions filed in the abovecaptioned proceeding to April 10, 1995.

The Commission has repeatedly emphasized the importance of the development of Non-voice, Non-geostationary ("NVNG") satellite systems. In light of the large number of comments and petitions to which the parties to this proceeding must respond, more time is necessary in order to address fully all of the issues raised by the applications. Those issues are of great importance, and could affect the emergence of the new NVNG satellite industry.

In addition, this week, CPM meetings are going on in Geneva in preparation for WRC-95, and a number of representatives of the applicants for NVNG spectrum are attending those meetings. The NVNG applicants have been working hard to obtain additional spectrum at WRC-95 outside of the context of those CPM meetings, and reply comments in that proceeding are due shortly.

Given the importance of the issues raised in these applications for new satellite systems, and the pressing requirements of preparation for WRC-95, GE Americom requests that the Commission extend the date for filing of replies until Monday, April 10, 1995.

Grant of this request for an extension of time to file replies will cause no harm to the public interest. In addition, an extension will not prejudice any party to this proceeding. 1/

<sup>1/</sup> In accordance with the Commission's rules, counsel for GE Americom has orally notified the other parties and Commission staff of the filing of this motion. See 47 C.F.R. § 146(c).

For the reasons discussed herein, GE Americom respectfully requests that the Commission grant this request for extension of time and extend the date for filing replies to April 10, 1995.

Respectfully submitted,

GE AMERICAN COMMUNICATIONS, INC.

Of Counsel

Philip V. Otero, Esq. GE American Communications, Inc. Four Research Way Princeton, New Jersey 08540 Peter A. Rohrbach Julie T. Barton

Hogan & Hartson, L.L.P. 555 Thirteenth Street, N.W. Washington, D.C. 20004 (202) 637-5600

March 21, 1995

#### CERTIFICATE OF SERVICE

I, Julie T. Barton, do hereby certify that on this 21st day of

March, 1995, a copy of the foregoing "Motion for Extension of Time to File Replies of

GE American Communications, Inc." was sent by first-class U.S. mail, postage

prepaid, or by hand where indicated, to the following:

Russell L. Schweickart Executive Vice President CTA Commercial Systems, Inc. 6116 Executive Boulevard, Suite 800 Rockville, MD 20852 Jill Abeshouse Stern Counsel for CTA Commercial Systems, Inc Shaw, Pittman, Potts, & Trowbridge 2300 N Street, N.W. Washington, DC 20037

Ashok Kaveeshwar President STARSYS Global Positioning, Inc. 4400 Forbes Boulevard Lanham, MD 20706-4392 Raul R. Rodriguez
Stephen D. Baruch
Counsel for STARSYS Global Positioning, Inc.
Leventhal, Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, DC 20006

David A. Bayer President Leo One USA Corporation 150 North Meramec Avenue, Suite 620 St. Louis, MO 63105

Robert A. Mazer, Esq. Counsel for Leo One USA Corporation Rosenman & Colin 1300 19th Street, N.W. Washington, DC 20036 Alan Parker President Orbital Communications Corporation 21700 Atlantic Boulevard Dulles, VA 20166-6801

Charles W. Ergen
President
E-SAT, Inc.
90 Inverness Circle East

Inglewood, CO 80112

Nader Modanlo President Final Analysis Communication Services, Inc. 7500 Greenway Center, Suite 1240 Greenbelt, MD 20770 Stephen L. Goodman Counsel for ORBCOMM Halprin, Temple & Goodman 1100 New York Avenue, N.W. Suite 650 East Washington, DC 20005

Leslie A. Taylor Counsel for E-SAT, Inc. Leslie Taylor Associates, Inc. 6800 Carlynn Court Bethesda, MD 20817-4301

Albert J. Catalano Ronald J. Jarvis Counsel for Final Analysis Communicatio Services, Inc. Catalano & Jarvis, P.C. 1101 30th Street, N.W. Suite 300 Washington, DC 20007 Joseph F. Sedlak Director of Government Relations Volunteers in Technical Assistance 1600 Wilson Boulevard, Suite 500 Arlington, VA 22209 Kristi Kendall \*
Satellite Policy Branch
Federal Communications Commission
2000 M Street, N.W., Room 500
Washington, DC 20554

Fern Jarmulnek \*
Chief
Satellite Policy Branch
Federal Communications Commission
2000 M Street, N.W., Room 500
Washington, DC 20554

Kathleen Campbell\*
Satellite Policy Branch
Federal Communications Commission
2000 M Street, N.W., Room 500
Washington, D.C. 20554

\* Hand-delivery

Julie T. Barton

#### BEFORE THE

# Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of the Applications of	
CTA Commercial Systems, Inc.	) File No. 23-SAT-P/LA-95
E-Sat, Inc.	) File No. 24-SAT-P/LA-95
Final Analysis Communication Services, Inc.	) ) File No. 25-SAT-P/LA-95
GE American Communications, Inc.	) File No. 26-SAT-P/LA-95
Leo One USA Corporation	) File Nos. 57-DSS-P/LA-94(48) ) 27-SAT-AMEND-95
Orbital Communications Corp.	) File No. 28-SAT-MP/ML-95
Starsys Global Positioning, Inc.	) File Nos. 31-DSS-AMEND-94 ) 32-DSS-LA-94
Volunteers in Technical Assistance	) File No. 29-SAT-AMEND-95
For Authority to Construct, Launch and Operate a Non-Voice, Non-Geostationary Low Earth Orbit	

# COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME

The Commission

To:

Final Analysis Communication Services, Inc. ("Final Analysis"), by its attorneys, hereby submits its "Comments in Support" of the "Motion for Extension of Time to File Replies of GE American Communications, Inc." filed with the Commission on March 21, 1995.

Final Analysis supports the extension of the March 27, 1995 procedural

date for the filing of Oppositions to Petitions to Deny and Replies to

Comments to April 10 for the reasons cited in the GE American

Communications, Inc. Motion.

In addition, it should be pointed out that the IWG-2 Report of the FCC

Industry Advisory Committee for the ITU 1995 World Radiocommunication

Conference (which deals with the spectrum allocation issues pertinent to

"Little LEOs") is in its final stages of drafting during this period. All of the

"Little LEO" applicants have made, and are continuing to make, significant

contributions to this effort. Accordingly, an extension of time in the cycle of

argumentative pleadings would be most helpful to ensure that the report is

completed in satisfactory fashion, and on a timely basis.

Respectfully submitted,

FINAL ANALYSIS

COMMUNICATION SERVICES, INC.

By Chut 1. Catelan Albert J. Catalano

7 indert j. Catalano

Ronald J. Jarvis

Its Attorneys

CATALANO & JARVIS, P.C.

1101 30th Street, N.W., Ste. 300

Washington, D.C. 20007

Telephone: (202) 338-3500 Facsimile: (202) 333-3585

Dated: March 22, 1995

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#### Certificate of Service

I, Ronald J. Jarvis, an attorney in the law firm of Catalano & Jarvis, P.C., hereby certify that on this 22nd day of March, 1995, I caused a true and complete photocopy of the foregoing "Comments in Support of Motion for Extension of Time to File Replies" to be sent, via U.S. first class mail, postage prepaid, to the following:

Scott Harris, Chief International Bureau Federal Communications Commission 1919 M Street, N.W., Room 658 Washington, D.C. 20554

Thomas S. Tycz, Chief Satellite & Radiocommunications Division Federal Communications Commission 2025 M Street, N.W., Room 6010 Washington, D.C. 20554

Cecily C. Holiday, Deputy Chief International Bureau Federal Communications Commission 2025 M Street, N.W., Room 6324 Washington, D.C. 20554

Fern J. Jarmulnek, Chief Satellite Policy Branch Federal Communications Commission 2025 M Street, N.W., Room 6324 Washington, D.C. 20554

Kristi Kendall, Esquire International Bureau Federal Communications Commission 2025 M Street, N.W., Room 6334-A Washington, D.C. 20554

Albert Halprin, Esquire Halprin, Temple & Goodman Suite 650 East Tower 1100 New York Avenue,N.W. Washington, D.C. 20005 Counsel for Orbcomm Raul Rodriguez, Esquire Leventhal, Senter & Lerman 2000 K Street, N.W., Suite 600 Washington, D.C. 20006-1809 Counsel for Starsys

Jonathan Wiener, Esquire Goldberg, Godles, Wiener & Wright 1229 19th Street, N.W. Washington, D.C. 20036 Counsel for VITA

Robert A. Mazer, Esquire Rosenman & Colin 1300 -- 19th Street, N.W., Suite 200 Washington, D.C. 20036 Counsel for Leo One USA

Peter A. Rohrback, Esquire Hogan & Hartson, L.L.P. 555 13th Street, N.W. Washington, D.C. 20004 Counsel for GE American Communications, Inc.

Jill Abeshouse Stern, Esquire Shaw, Pittman, Potts & Trowbridge 2300 N Street, N.W. Washington, D.C. 20037 Counsel for CTA

Leslie A. Taylor Leslie Taylor Associates, Inc. 6800 Carlynn Court Bethesda, MD 20817-4301 Representing E-SAT

Ronald J. Jarvis