

RECEIVED

MAR 22 1995

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

MAR 21 1995

<hr/>	
In the Matter of)
)
Non-Voice, Non-Geostationary Low)
Earth Orbit Satellite Applications)
Filed by:)
)
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 No. 27-SAT-Amend-95
)
Orbital Communications Corporation) File No. 28-SAT-MP/ML-95
)
Starsys Global Positioning, Inc.) File No. 31-DSS-Amend-94
) 32-DSS-LA-94
)
Volunteers In Technical Assistance) File No. 29-SAT-Amend-95
)
<hr/>	

OPPOSITION TO
MOTION FOR EXTENSION OF TIME

Leo One USA Corporation ("Leo One USA"), by counsel, hereby opposes the GE American Communications, Inc. ("GE Americom") Motion for Extension of Time to submit replies to Comments and Petitions filed on March 21, 1995 with regard to the above-captioned applications. In its Motion, GE Americom asks the Commission to extend the time from March 27, 1995 until April 10, 1995 for applicants to submit their Oppositions. In support of this Motion GE Americom contends that more time is needed to analyze the large

number of Comments and Petitions and that representatives of the applicants for NVNG MSS spectrum are attending the Conference Preparatory Meetings in Geneva.

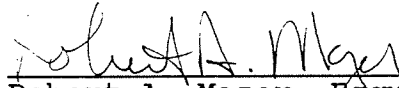
Leo One USA opposes this request for a number of reasons. First, Leo One USA believes that 33 days is an adequate amount of time to respond to the Petitions and Comments filed on February 24, 1995. Although a number of filings were submitted on February 24, 1995, the purpose of the Oppositions due on March 27, 1995 are for the applicant to respond to Petitions and Comments made against its individual application. Thus, an applicant need only respond to a subset of the total number of Comments and Petitions filed. Second, it should be noted that Leo One USA was provided only 30 days to respond to the numerous Petitions and Comments to its application.¹ It would not be fair to provide other pending applicants more time. Finally, although GE Americom claims that the delay will not cause harm to the public interest, it must be recognized that the Commission has already granted one 30-day extension of time for filing Oppositions and that it has been almost 18 months since Leo One USA filed its application. The grant of an additional extension will only cause delays in the Commission's consideration of these applications, grant of new NVNG MSS licenses and ultimately in the availability of competitive NVNG MSS services.

¹ Petitions and Comments on Leo One USA's application were due to be filed with the Commission on November 16, 1994. Leo One USA was required to file its response on December 16, 1994.

For these reasons, Leo One USA opposes the GE Americom's
Motion for Extension of Time.

Respectfully submitted,

LEO ONE USA CORPORATION



Robert A. Mazer, Esquire
Rosenman & Colin
1300 19th Street, N.W., Suite 200
Washington, DC 20036
(202) 463-4640
Its Attorney

March 22, 1995

CERTIFICATE OF SERVICE

I, Robert A. Mazer, hereby certify that the foregoing "Opposition to Motion for Extension of Time" was served by hand or first-class mail, postage prepaid, this 2nd day of March, 1995, on the following persons:

Scott Blake Harris, Chief*
International Bureau
Federal Communications Commission
2000 M Street, N.W., Room 800
Washington, DC 20554

Thomas S. Tycz, Chief*
Satellite & Radiocommunication Division
International Bureau
Federal Communications Commission
2000 M Street, N.W. Room 520
Washington, DC 20554

Cecily C. Holiday, Deputy Chief*
Satellite & Radiocommunication Division
International Bureau
Federal Communications Commission
2000 M Street, N.W. Room 520
Washington, DC 20554

Fern J. Jarmulnek, Chief*
Satellite Policy Branch
Satellite & Radiocommunication Division
International Bureau
Federal Communications Commission
2000 M Street, N.W., Fifth Floor
Washington, DC 20554

Ms. Kristi Kendell*
Satellite Policy Branch
Satellite & Radiocommunication Division
International Bureau
Federal Communications Commission
2000 M Street, N.W., Fifth Floor
Washington, DC 20554

Albert Halprin, Esq.
Halprin, Temple & Goodman
Suite 650 East Tower
1100 New York Avenue, N.W.
Washington, DC 20005
(Counsel for ORBCOMM)

Raul R. Rodriguez, Esq.
Leventhal, Senter & Lerman
2000 K Street, N.W., Suite 600
Washington, DC 20006
(Counsel for STARSYS)

CERTIFICATE OF SERVICE

I, Robert A. Mazer, hereby certify that the foregoing "Comments of Leo One USA Corporation" was served by hand or first-class mail, postage prepaid, this 6th day of March, 1995, on the following persons:

Scott Blake Harris, Chief*
International Bureau
Federal Communications Commission
2000 M Street, N.W., Room 800
Washington, DC 20554

Thomas S. Tycz, Chief*
Satellite & Radiocommunication Division
International Bureau
Federal Communications Commission
2000 M Street, N.W. Room 520
Washington, DC 20554

Cecily C. Holiday, Deputy Chief*
Satellite & Radiocommunication Division
International Bureau
Federal Communications Commission
2000 M Street, N.W. Room 520
Washington, DC 20554

Fern J. Jarmulnek, Chief*
Satellite Policy Branch
Satellite & Radiocommunication Division
International Bureau
Federal Communications Commission
2000 M Street, N.W., Fifth Floor
Washington, DC 20554

Ms. Kristi Kendell*
Satellite Policy Branch
Satellite & Radiocommunication Division
International Bureau
Federal Communications Commission
2000 M Street, N.W., Fifth Floor
Washington, DC 20554

Albert Halprin, Esq.
Halprin, Temple & Goodman
Suite 650 East Tower
1100 New York Avenue, N.W.
Washington, DC 20005
(Counsel for ORBCOMM)

Raul R. Rodriguez, Esq.
Leventhal, Senter & Lerman
2000 K Street, N.W., Suite 600
Washington, DC 20006
(Counsel for STARSYS)

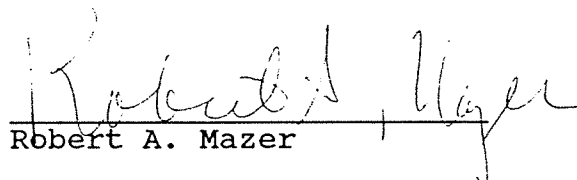
Henry Goldberg, Esq.
Goldberg, Godles, Wiener & Wright
1229 19th Street, N.W.
Washington, DC 20036
(Counsel for VITA)

Leslie A. Taylor, Esq.
Leslie Taylor Associates
6800 Carlynn Court
Bethesda, MD 20817-4301
(Counsel for E-Sat, Inc.)

Albert J. Catalano, Esq.
Ronald J. Jarvis, Esq.
Catalano & Jarvis, P.C.
1101 30th Street, N.W.
Suite 300
Washington, DC 20007
(Counsel for Final Analysis)

Jill Abeshouse Stern, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, DC 20037
(Counsel for CTA)

Julie T. Barton, Esq.
Hogan & Hartson
555 Thirteenth Street, N.W.
Washington, D.C. 20004-1109
(Counsel for Americom)


Robert A. Mazer