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March 5, 1998

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Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: Notice of Ex Parte Presentations of Final Analysis Communication Services, Inc. regarding Application for Non-Voice Non-Geostationary Mobile Satellite Service ("NVNG MSS") Authorization, File No. 25-SAT-P/LA-95; 76-SAT-AMEND-95; 89-SAT-AMEND-96; 151-SAT-AMEND-96; 7 SAT-AMEND-98

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, Final Analysis Communication Services, Inc. ("Final Analysis"), by its attorneys, hereby submits notification of oral *ex parte* presentations in the above-referenced proceeding, as follows: On Tuesday, March 3, 1998 Nader Modanlo, President, and Sharon Edwards, Director of Government Relations for Final Analysis, and the undersigned counsel, met with Peter Tenhula, Legal Advisor to Commissioner Powell. On that same date, the same individuals also met separately with Commissioner Tristani and Intern Jim Morgan. On Wednesday, March 4, 1998, Mr. Modanlo and Ms. Edward, along with Phil Permut of Kelley Drye & Warren LLP, met with Ari Fitzgerald, Legal Advisor and John Nakahata, Chief of Staff, in the Office of the Chairman.

The purpose of each meeting was to provide a general introduction to the company and its proposed NVNG MSS system. The timing of action on the above referenced NVNG MSS application, as well as international allocation issues of concern to the NVNG MSS industry in the upcoming WRC-99 ITU Conference, were also discussed.

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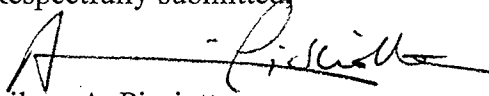
Ms. Magalie R. Salas

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March 5, 1998

Please do not hesitate to call me if you have any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "A. Pisciotta", with a long horizontal stroke extending to the right.

Aileen A. Pisciotta

Counsel to Final Analysis Communication Services, Inc.

cc: Attached service list

CERTIFICATE OF SERVICE

I, Arethea Johnson, hereby certify that a true and correct copy of the foregoing letter to Ms. Magalie R. Salas from counsel to Final Analysis Communication Services, Inc. was sent by hand delivery or mailed, via first-class mail, postage prepaid, this 5th day of March 1998, to each of the following:

Chairman William E. Kennard*
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Washington, D.C. 20554

Commissioner Gloria Tristani*
Federal Communications Commission
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Commissioner Harold W. Furchtgott-Roth*
Federal Communications Commission
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Commissioner Susan Ness*
Federal Communications Commission
1919 M Street, N.W., Room 832
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Commissioner Michael K. Powell*
Federal Communications Commission
1919 M Street, N.W. Room 844
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Ms. Regina Keeney*
Chief, International Bureau
Federal Communications Commission
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National Oceanic and Atmospheric
Administration
Office of Radio Frequency Management
Room 2246, SSMC-2
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Silver Spring, Maryland 20910


Arethea Johnson

[Letterhead: Russian Space Agency. General Director]

March 10, 1998

No. 100-21-882
Moscow

To: O.P. Dorofeyev,
General Director of
"Polyot" Production Association

644021, Omsk,
226 Bogdana Khmel'nitskogo Str.

Notice of Licenses Invalidation

Russian Space Agency, guided by the "Regulation on Licensing Space Activities" approved by Decree No. 104 of the Government of the Russian Federation, dated February 2, 1996, proceeding from the September 7, 1997 award of Omsk Region Arbitration Court, which invalidated the Resolution No. 80 by Head of Administration of Oktyabsky District of Omsk "On the registration of the enterprise of "Polyot" Production Association Design Bureau", dated January 27, 1993, adopted a decision to revoke Licenses No. 51 of March 25 1994, No.No. 263 and 265 of May 27, 1997, issued to Polyot Design Bureau. The licenses shall be returned to the Russian Space Agency.

The decision taken by the RSA shall be communicated to all the legal entities (foreign parties including) having contractual relations with Polyot Design Bureau.

I also inform you that all the legal entities founded by Polyot Production Association and engaged in space activities should obtain RSA authorisations to such activities.

[Signature] Y.N. Koptev

DECISION
OF THE GOVERNMENT OF THE RUSSIAN FEDERATION
NO. 104 OF FEBRUARY 2, 1996
ON APPROVAL OF THE REGULATIONS ON LICENSING OF SPACE ACTIVITIES

The Government of the Russian Federation decides:
To approve the attached Regulations on the Licensing of Space Activity.

Chairman of the Government
of the Russian Federation

Viktor Chernomyrdin

REGULATIONS
ON LICENSING OF SPACE ACTIVITY
(Approved by the Decision of the Government of the Russian Federation
No. 104 of February 2, 1996)

1. These Regulations were drafted in accordance with the Law of the Russian Federation on Space Activity, the Decision of the Government of the Russian Federation No. 1418 of December 24, 1994 on Licensing of Specific Kinds of Activity and shall establish the procedure for licensing in the Russian Federation of space activity in the interests of scientific research and national economy.

2. Licensing of space activity in the Russian Federation is carried out with the purpose of execution of state control thereof taking into account its national interests and safety, adherence to the international law and international obligations the Russian Federation has in the area of space research and its utilization, development of the market of space related services and protection of interests of its customers.

3. Subject to licensing shall be space activity of legal entities irrespective of their organizational and legal form as well as that of individual entrepreneurs of the Russian Federation, and space activity of foreign citizens and organizations, carried out under the jurisdiction of the Russian Federation.

Subject to licensing are: space activity, which includes development (including production and testing) of space missile systems and their component parts, storage, prelaunch preparation, launch and utilization of space crafts, and space missions control.

4. In the Russian Federation the Russian Space Agency carries out licensing of space activity in the interests of science and national economy.

5. To obtain the license the applicant shall submit to the Russian Space Agency the following:

- a) an application to receive license which shall contain:
for legal entities - their title, organizational and legal form, legal address, number of the settlement account, and the name of the corresponding bank;
for individual entrepreneurs - first name, given name, middle name, passport data (its series, number, who and when had issued it), residence location;
type of activity;
license duration;
- b) copies of statutory documents, and should the copies bear no notary authentication, originals shall be presented;
- c) a copy of the legal entity state registration certificate;
- d) a document certifying payment of the application examination fee;
- e) a taxation organ registration certificate, or a certificate of state registration for a natural entity as an individual entrepreneur authenticated with a taxation organ seal;
- f) a permission of the State Commission on the Radio Frequencies at the Ministry of Communications of the Russian Federation to use frequency bands for the development and (or) utilization of the space radio-electronic equipment (when licensing activities that involve development and utilization of space communication means)
- g) guarantee obligations of the applicant confirming the fact of inclusion of the foreign space craft to be delivered to space by means of Russian launch means into the national register of the country-owner of this space craft;
- h) documents certifying the safe nature of the space activity (including ecological safety, safety against fires and explosions) and reliability of the space equipment;
- i) a license, as established by Article 27 of the Law of the Russian Federation on State Secrets.

6. Foreign legal entities and individual entrepreneurs acting as customers or co-producers of works in addition to the application and registration documents, that confirm their operating under the jurisdiction of the Russian Federation, shall present:

- a) a contract between the customer and the principal entity carrying out the works;
- b) documents confirming the safe nature of the declared kind of activity and reliability of the equipment to be used;
- c) a copy of the national license of the right to be engaged in space activity (if it is provided for by a relevant national legislation);
- d) proof of financial viability, that shall guarantee realization of the declared kind of space activity;

7. After the documents were submitted as specified in Items 5 and 6 of these Regulations, the Russian Space Agency need be, may arrange for an additional expert examination of the declared kind of space activity.

8. At the stage of the additional expert examination of the declared kind of the space activity the Russian Space Agency may request the Russian or foreign applicant to provide technical (design related) materials proving feasibility of the declared kind of space activity.

It is prohibited to demand from the applicant submission of other documents that are not provided for by these Regulations.

9. All documents submitted in order to obtain the license shall be registered by the Russian Space Agency.

10. The license for the declared kind of space activity shall be issued upon the following conditions:

a) the full set of documents listed in Items 5 and 6 of these Regulations shall be submitted;

b) positive conclusion of the expert commission (should an additional expert examination be carried out).

11. Upon examining the submitted documents and the expert conclusion the Russian Space Agency shall decide to grant (or to refuse the license) the license for the declared kind of space activity.

12. The decision whether to grant or refuse the license shall be taken within 30 days since the reception of the application with all necessary documents.

If an additional expert examination is necessary, the decision shall be taken within 15 days after the expert conclusion is received, but not later than 60 days after submission of the application with the required documents.

In certain cases, depending on the complexity and the scope of the material to be examined by experts, the time period required to take the decision on whether to grant or refuse the license may be extended by the Director General of the Russian Space Agency.

13. The license shall be issued for the term of not less than three years.

A license may be issued for a term less than three years should the applicant request so.

The term of license shall be extended following the procedure established for its granting.

A separate license shall be issued for each kind of space activity.

14. The license shall be signed by the Director General of the Russian Space Agency (or in his absence by Deputy Director General) and authenticated with seal.

15. License forms shall have protection features corresponding to the level of securities to bearer. They shall be kept in accordance with strict registration procedures, and have registration series and numbers. The Russian Space Agency shall carry out procurement, registration, and storage of license forms.

16. Notification of the refusal to grant the license shall be forwarded to the applicant in writing within 3 days after the decision is taken with enclosed statement of the grounds for the refusal.

The following shall be the grounds to refuse granting the license:

distorted or untrue information found in the documents submitted by the applicant;

negative conclusion of expert commission.

17. The license shall be issued after the applicant shall provide documentary proof of his payment of the license fee.

18. An additional, including an independent expert examination, shall be conducted should the declared kind of space activity not be listed by the Federal space programme of Russia or for cases of realization of commercial space projects.

19. An additional expert examination shall be conducted by scientific research organizations or by independent experts on a contractual basis on the instruction of the Russian Space Agency.

20. Duration of an expert examination shall not exceed 30 days since the day of reception of the application with all necessary documents. In some cases, depending on the complexity of the declared kind of space activity this period may be extended by the Russian Space Agency by additional 30 days though not exceeding the time periods set forth in Item 12 of these Regulations.

The expert conclusion must be signed by the chief of the scientific organization or by the chief of the creative group of the independent experts and handed according to the report of the delivery-acceptance to the Russian Space Agency.

21. General provisions:

the license shall cover only the kind of space activity it specifies;

the license holder shall not be entitled neither to transfer nor to sell it to any other person.

Should a legal entity be liquidated or a state registration certificate of an individual entrepreneur expire the license issued to them shall be regarded invalid.

The license holder shall apply for re-registration within 15 days should there be re-organization, a change of title of the legal entity, or change in passport data of the individual entrepreneur.

Re-registration of the license shall be carried out in the manner envisaged for obtaining thereof.

Until the license is re-registered, its holder shall carry on his activity on the basis of the previously issued license, and in case of license loss it shall be based on a temporary permission granted by the Russian Space Agency.

22. When licensing the declared kind of space activity the Russian Space Agency shall:

impartially examine applications of legal entities and individual entrepreneurs for the right to obtain the license;

fulfil provisions of these Regulations;

perform control of licensing activity;

within 3 days inform the license holder of suspension or withdrawal of the license;

enter under the heading Conditions of the Realization of Space Activity in the license form any amendments caused by any new international obligations undertaken by the Russian Federation in the area of space.

23. The license holder shall:

fulfil general and specific provisions of the license during the whole term of the license;

permit personnel assigned by the Russian Space Agency to carry out verification checks of the conditions under which the

license provisions for specific kind of space activity listed in it are realized.

inform the Russian Space Agency about termination of the declared kind of space activity;

return the license and terminate the space activity allowed under the license on the basis of decision of the Russian Space

Agency;

provide written replies to requests of the Russian Space Agency on the matters pertaining to the declared kind of space activity.

24. The Russian Space Agency shall have the right to:

a) send requests to the license holder concerning fulfilment of the license provisions;

b) request that by the moment when launch preparation works begin the license holder shall have a conformity certificate for the space crafts and insurance policy of mandatory insurance of space activity in accordance with the legislation of the Russian Federation;

c) carry out controlling inspection of the activity undertaken by the license holder to fulfil the licensing provisions.

d) suspend launch preparation works of an space craft or any other operations on the site of the realization of the space activity should:

they endanger health and threaten people as well as national interests and security of the Russian Federation;

the works be carried out without a license or with violations of its provisions.

25. The Russian Space Agency shall suspend the license or declare it invalid in cases of:

failure by the license holder to fulfil directions or instructions of state bodies or should the legal entity activities, and those of an individual entrepreneur be suspended in accordance with the laws of the Russian Federation;

untrue data revealed in the documents submitted to obtain the license;

liquidation of the legal entity or termination of the state registration certificate of the individual entrepreneur;

breach by the license holder of the license provisions;

appropriate application being submitted by the license holder.

26. Decision to suspend the license or to terminate it shall be forwarded in writing to the license holder and to organs of the State Tax Service of the Russian Federation within 3 days after it is taken.

27. The Russian Space Agency shall keep a registry of data on granted, suspended and terminated licenses.

28. Size of fee an applicant is charged for examination of his application shall be calculated on the basis of costs of the following kinds of works:

examination and registration of the application to obtain the license, organization of work of an expert commission (in case of an additional expert examination of the declared kind of activity);

carrying out of expert examination and working out of an expert conclusion;

drafting and registration of the license, entering its content into the data base, maintenance of the information data base.

29. Fee for the examination of the application and granting of the license shall be payable to the federal budget revenue.

30. In case of refusal to grant the license, the fee for the examination of the application shall not be repayable to the applicant.

31. Procedure for calculation of the fee for the examination of an application and for granting the license for the declared kind of space activity shall be determined by the Russian Space Agency in agreement with the Ministry of Finance of the Russian Federation and the Ministry of Economics of the Russian Federation.

32. Activities of the Russian Space Agency associated with the licensing of space activity shall be funded within the limits of resources allocated to the Russian Space Agency for maintenance of its central office staff.

33. Those carrying out space activity without license or with breaches of license provisions shall be liable in the manner laid down by the legislation of the Russian Federation.

34. Heads and officials of the Russian Space Agency authorized to carry out the licensing activity shall be liable for any violations or improper execution of the established procedure for carrying out of licensing activity in accordance with the legislation in force.

35. Decisions and actions of the Russian Space Agency, authorized to perform licensing of space activity may be appealed in an established manner.