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

Federal Communications Commission
Office of Secretary

Received

MAY 22 1998

Satellite Policy Branch
International Bureau

In the Matter of)
)
FINAL ANALYSIS)
COMMUNICATION SERVICES, INC.)
)
For Authorization to Construct, Launch)
and Operate a Non-Voice, Non-)
Geostationary Mobile Satellite System)
in the 148-150.05 MHz, 400.15-401 MHz,)
and 137-138 MHz bands)

File Nos. 25-SAT-P/LA-95
76-SAT-AMEND-95
79-SAT-AMEND-96
151-SAT-AMEND-96
7-SAT-AMEND-98

To: The Commission

OPPOSITION

Final Analysis Communication Services, Inc. ("Final Analysis"), by its attorneys, hereby opposes the "Application for Review" filed by Orbital Communications Corp., ("ORBCOMM") on May 1, 1998, of the International Bureau's decision (the "Licensing Order")¹ granting Final Analysis its above-captioned Little LEO authorization. ORBCOMM incorrectly insists that as a first round Little LEO licensee it is entitled under Section 25.142(a)(1) of the Commission's Rules, 47 C.F.R. § 25.142(a)(1), to special interference protection. In twin applications for review, ORBCOMM has demanded that coordination with both Final Analysis² and Leo One USA Corporation ("Leo One")³ be completed before licenses are finally awarded.

¹ See *Final Analysis Communication Services, Inc.*, Order and Authorization, DA 98-616 (rel. Apr. 1, 1998).

² ORBCOMM raises no other substantive issue with respect to Final Analysis's license.

³ See ORBCOMM Application for Review filed on March 16, 1998 ("ORBCOMM Application for Review of Leo One") of *Leo One USA Corp.*, Order and Authorization, DA 98-238 (rel. Feb. 13, 1998) ("*Leo One Order*"). The official pleading cycle in the ORBCOMM Application for Review of Leo One was completed prior to ORBCOMM's filing of the instant Application for Review against Final Analysis.

ORBCOMM's Application for Review, particularly with respect to Final Analysis, is misplaced and unsupported. ORBCOMM incorrectly interprets the requirements of Section 25.142, and has not demonstrated that post-licensing coordination – which is the Commission norm in satellite licensing– is not appropriate here. In fact, because of the adverse impact on competitive entry, the relief requested by ORBCOMM would be contrary to the public interest. In any event, ORBCOMM's Application for Review is really no more than an untimely petition for reconsideration of the *Second Round Processing Order*⁴ which, among other things, found that applicants could share the 148-149.9 MHz uplink band without unacceptable interference. Accordingly, ORBCOMM's Application for Review should be denied.⁵

I. THE BUREAU'S GRANT OF A LICENSE TO FINAL ANALYSIS IS CONSISTENT WITH THE SHOWING REQUIRED UNDER SECTION 25.142(A)(1) OF THE RULES.

ORBCOMM's central claim is that, under Section 25.142(a)(1), it is vested with a purported "right to protection from interference"⁶ that imposes a corresponding duty on Final Analysis to show, before it can be granted a license, that ORBCOMM will not incur unacceptable interference due to sharing in the 148-149.9 MHz uplink band. The *Licensing Order* correctly ruled that Section 25.142(a)(1) does not require that Final Analysis demonstrate that it will not cause "unacceptable interference" to ORBCOMM before it can be licensed.⁷ As

⁴ *Amendment of Part 25 of the Commission's Rules to Establish Rules and Policies Pertaining to the Second Processing Round of the Non-Voice, Non-Geostationary Mobile Satellite Service*, IB Docket No. 96-220, *Report and Order* (rel. October 15, 1997) ("*Second Round Processing Order*").

⁵ See Opposition of Leo One, filed on March 31, 1998 to ORBCOMM Application for Review of Leo One License ("Leo One Opposition to ORBCOMM") at 4, 10-11, in which Leo One makes the same argument.

⁶ See ORBCOMM Application for Review at 8.

⁷ *Licensing Order* at ¶¶ 20-26.

Leo One has argued,⁸ adoption by the International Bureau of the Joint Proposal band plan by rulemaking constituted a regulatory determination that unacceptable interference in the 148-149.9 MHz band due to sharing of uplink channels could be avoided with the use of DCAAS-like techniques. Therefore, Section 25.142(a)(1) is satisfied as long as the sharing licensees submit information in their application, as Final Analysis has, which shows that they will utilize such techniques. Nothing in the rule requires completion of full coordination with first round licensees as a pre-condition to grant of second round licenses.

As the Commission specifically observed in amending its Part 25 application rules for the Little LEO service, requiring pre-licensing coordination of a new service like Little LEOs “would be unduly burdensome and wasteful.”⁹ Furthermore, the Commission made clear that Section 25.142(a)(1) does not give existing Little LEO licensees such as ORBCOMM the right to use the claim of “unacceptable interference” to block the licensing of subsequent Little LEO licensees such as Final Analysis. Rather, the Commission made clear that Section 25.142(a)(1) relies on the parties to coordinate their operations post-licensing in good faith.¹⁰ Accordingly, the *Licensing Order* properly found that Section 25.142(a)(1) does not require it to reach a determination that Final Analysis’s system will not cause unacceptable interference to ORBCOMM’s licensed operations before granting it a license.

⁸ See Leo One Opposition to ORBCOMM at p. 12-13.

⁹ See *Amendment of the Commission’s Rules to Establish Rules and Policies Pertaining to a Non-Voice, Non-Geostationary Mobile-Satellite Service*, Notice of Proposed Rulemaking, CC Docket No. 92-76, 8 FCC Rcd 6330 at ¶ 28 (1993) (“*First Round Little LEO NPRM*”).

¹⁰ See *First Round Little LEO NPRM*, 8 FCC Rcd 6330 at ¶ 29; see also *Amendment of the Commission’s Rules to Establish Rules and Policies Pertaining to a Non-Voice, Non-Geostationary Mobile-Satellite Service*, Report and Order, 8 FCC Rcd 8450, 8452-3 (1993) (“*First Round Little LEO Report and Order*”) (citing Section 25.142(b)(3)).

II. POST-LICENSING COORDINATION OF FINAL ANALYSIS'S SYSTEM WILL ADEQUATELY PROTECT ORBCOMM

ORBCOMM claims that during peak periods when there are relatively few "open" channels in the 148-149.9 MHz uplink, there is a "significant likelihood that Final Analysis' or Leo One's subscribers will be directed to transmit on the same channels as ORBCOMM's subscribers" and that post-licensing coordination provides no assurance to ORBCOMM that it will be protected from such interference.¹¹ ORBCOMM's claim is without merit. The Commission properly decided in establishing rules for Little LEO licensing that it would rely on post-licensing coordination efforts of the parties to achieve intersystem coordination.

Furthermore, Final Analysis has demonstrated a continuing readiness and willingness to enter into good faith coordination negotiations with ORBCOMM to determine how best to achieve shared, interference-free subscriber uplink operations in the 148-149.9 MHz uplink band. As stated in Final Analysis's conforming amendment, it will employ its proprietary Scanning Telemetry Activity Receive System ("STARS") polling technique, which is based on the Dynamic Channel Activity Assignment System ("DCAAS") technique recommended in the *Second Round Processing Order*. Indeed, there are additional interference-avoidance techniques available that can be mutually adopted, *post-licensing*.¹²

ORBCOMM has no basis to suspect that coordination will not be fulfilled in good faith by Final Analysis given its substantial efforts to date to coordinate with ORBCOMM. Indeed, Final Analysis already entered into good faith, joint coordination with ORBCOMM, *prior to*

¹¹ ORBCOMM Application for Review at 16.

¹² See Final Analysis Reply Comments to ORBCOMM Comments on Final Analysis Conforming Amendment at 4-7, filed on Dec. 16, 1997 ("Final Analysis Reply Comments").

receiving its license to explore the use of pre-defined algorithms to test Final Analysis's proprietary STARS system in coordinating operations with ORBCOMM in the uplink band. Through Final Analysis's experimental satellite program it has continued to refine the STARS technology, and based on this experience is confident of its accuracy and reliability.

Furthermore, Final Analysis and ORBCOMM started coordination discussions as early as December, 1997, and both parties have discussed the need to examine one another's interference avoidance scanning methodology. As stated in the joint Final Analysis-ORBCOMM letter submitted to the Commission on December 15, 1997:

In order to verify that Final Analysis's proprietary STARS system and ORBCOMM's proprietary DCAAS system can operate along side each other to avoid co-channel interference in the 148-150 MHz band, ORBCOMM and Final Analysis have discussed and agreed that each company's technology may be reviewed by an independent and confidential source. This approach would protect each company's proprietary interest in the technology while facilitating expeditious resolution of coordination issues.¹³

In a letter dated February 20, 1998, to Alan Parker, Nader Modanlo, President of Final Analysis offered to continue meetings to discuss coordination issues, but that letter has not been responded to.¹⁴ These letters and the initial meeting provide a clear and convincing basis for the Bureau to conclude that it could properly rely on at least Final Analysis's good faith post-licensing coordination with ORBCOMM.¹⁵

¹³ See Letter from Aileen A. Pisciotta, Counsel to Final Analysis and Stephen L. Goodman, Counsel to ORBCOMM, to Ms. Regina Keeney, Chief, International Bureau, dated December 15, 1997.

¹⁴ A copy of this letter was previously provided to the International Bureau, but is also attached hereto for reference.

¹⁵ In contrast, Leo One has not specified a proprietary channel assignment system like STARS, but simply alleges in its original 1994 application that it will operate an unspecified "DCAAS-like system" that will adequately protect satellite users of the band.

(continued...)

In the alternative, to adopt ORBCOMM's urged approach of pre-licensing coordination is tantamount to making all new NVNG MSS licensees operate on a secondary, non-interference, basis to first round licensees such as ORBCOMM. Clearly, this is not what the Commission's Little LEO licensing rules or policies require. The Commission stated in the *First Round Little LEO Report and Order* that the good faith intersystem coordination requirements of Section 25.142(b)(3) "require licensees to coordinate not only with future licensees, but with future applicants as well."¹⁶ Furthermore, Section 25.142(b)(3) provides that "all affected applicants, permittees, and licensees shall, at the direction of the Commission, cooperate fully and make every reasonable effort to resolve technical problems and conflicts that may inhibit effective and efficient use of the radio spectrum." Thus, applicants for NVNG MSS licenses are placed on an equal footing with existing licensees under the Commission's intersystem coordination rules, to the extent that licensees and applicants alike are under an obligation to engage in good faith coordination. ORBCOMM cannot hold Final Analysis to a higher coordination standard with respect to Final Analysis's new system than applies to ORBCOMM itself with respect to its licensed system.

ORBCOMM has failed to explain why the Commission should depart from post-licensing coordination as the norm with respect to Final Analysis's licensed operations or any second round licensed operations.¹⁷ As observed in Leo One's Opposition to ORBCOMM, the Commission has effectively relied on post-licensing coordination in its DomSat proceeding,

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Nor, to Final Analysis's knowledge, has Leo One entered into any substantive coordination discussions with ORBCOMM.

¹⁶ See *First Round Little LEO Report and Order*, 8 FCC Rcd at 8453.

¹⁷ Cf. ORBCOMM Application for Review at 15-18.

Radio Determination Satellite Service (“RDSS”) proceeding and the Big LEO proceeding.¹⁸

III. THE BUREAU PROPERLY RELIED ON THE JOINT PROPOSAL TO CONCLUDE THAT GRANT OF FINAL ANALYSIS’S LICENSE WILL NOT INTERFERE WITH ORBCOMM’S SYSTEM.

The Bureau properly relied on ORBCOMM’s agreement to the spectrum sharing plan established in the Joint Proposal to conclude that grant of Final Analysis’s license will not interfere with ORBCOMM’s existing uplink system operations. Implicit in ORBCOMM’s agreement to the spectrum sharing plan in the Joint Proposal adopted in the *Second Processing Round Order* is its acknowledgment that it would co-exist with Final Analysis’s operations in the shared 148-149.9 MHz uplink bands. ORBCOMM should not be allowed to renege on that agreement now that Final Analysis has received a license and re-assert a putative right to demand a showing that Final Analysis will not cause “unacceptable interference” to ORBCOMM under Section 25.142(a).¹⁹ The *Licensing Order* states that: “[a]s part of the Joint Proposal, ORBCOMM expressly agreed to permit other second processing round applicants to operate in the channels comprising the 148-149.9 MHz uplink band, including those frequencies licensed to ORBCOMM in the first processing round.”²⁰ Thus, ORBCOMM is incorrect in asserting that:

¹⁸ See Leo One Opposition to ORBCOMM at 15-16 (citing *Licensing of Space Stations in the Domestic Fixed-Satellite Service and Related Revisions of Part 25*, CC Docket No. 81-704 (rel. Aug. 16, 1983); *Amendment of the Commission’s rules to Allocate Spectrum for, and Establish Other Rules and Policies Pertaining to, a Radiodetermination Satellite Service*, 104 F.C.C.2d 650 (1986); *Report and Order Amending the Commission’s Rules to Establish Rules and Policies Pertaining to a Mobile Satellite Service in the 1610-1626.5/2483.5-2500 MHz Frequency Bands*, 9 FCC Rcd 5936 at ¶ 61 (1994)).

¹⁹ Moreover, as Leo One points out, despite several opportunities, ORBCOMM did not raise this issue previously. See Leo One Opposition to ORBCOMM at n.22.

²⁰ *Licensing Order* at ¶ 22.

“[b]y agreeing to the Joint Sharing Proposal, ORBCOMM did not surrender any of the protection afforded it as a licensee.”²¹

In fact, all the signatories to the Joint Proposal, including ORBCOMM, expressly “acknowledge[d] that adoption of th[e] Joint Proposal by the FCC avoids mutual exclusivity among the Parties in this proceeding.”²² Furthermore, it is well-settled under Commission precedent that two systems on the same frequency are “mutually exclusive” only if “grant of one would create such interference on the channel given an existing licensee as in effect to modify the earlier license.”²³ Therefore, in acknowledging that the Commission’s adoption of the Joint Proposal’s sharing plan would avoid mutual exclusivity with Final Analysis, ORBCOMM is chargeable with the knowledge that the definition of interference normally associated with operations deemed “mutually exclusive” in the same band no longer obtains with respect to Final Analysis’s shared use of the 148-149.9 MHz uplink band. Given that it agreed to co-exist with Final Analysis on a shared basis in the 148-149.9 MHz band, ORBCOMM cannot now claim that potential interference from the Final Analysis system is “unacceptable” under Section 25.142(a)(1) to the degree that Final Analysis must complete coordination with ORBCOMM before it is entitled to receive a Commission license.

IV. DELAYING SECOND ROUND ENTRY TO COMPLETE COORDINATION IS CONTRARY TO THE PUBLIC INTEREST

The *Licensing Order* correctly concluded that delaying licensing of Final Analysis to complete coordination to the degree demanded by ORBCOMM is contrary to the public interest as it would “delay competition and new services for consumers and afford little, if any,

²¹ Cf. ORBCOMM Application for Review at 8.

²² Joint Proposal at ¶ 5, p.9.

interference protection to ORBCOMM beyond that which it will obtain through the post-license coordination process."²⁴ Competition for Little LEO services is still in its infancy. Indeed, the entire purpose of the *Second Round Processing Proceeding* was to introduce more new entrant Little LEO competitors to ORBCOMM's existing first round operations. ORBCOMM inappropriately questions the market study in the *Second Round Processing Order* showing that new Little LEO entry is necessary.²⁵ In fact, in agreeing to the Joint Proposal, ORBCOMM ratified the view that additional Little LEO competition is in the public interest. For ORBCOMM now to claim that the prompt licensing of additional competitors should be delayed until their systems are coordinated to its satisfaction is directly contrary to ORBCOMM's express agreement under the Joint Proposal.

Furthermore, ORBCOMM's alternative request in its Application for Review that Final Analysis's "authority to operate" be conditioned on demonstrating that it will not cause harmful interference to ORBCOMM is not necessary. Such an onerous condition on Final Analysis's ability to operate is not in the public interest, where Final Analysis has already demonstrated its

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²³ See *Ashbacker Radio Corp. v. FCC*, 66 S.Ct. 148, 151 (1945) (citing *FCC v. Nat'l Broadcasting Ass'n*, 319 U.S. 239, 63 S.Ct. 1035).

²⁴ *Bureau Order* at ¶ 26.

²⁵ ORBCOMM Application for Review at 12. The Commission's recent approval of the AMSC acquisition of Ardis on the basis that "the market for mobile data communications is already competitive," as cited by ORBCOMM, does not contradict the Bureau's finding in this proceeding that the licensing of additional satellite-based Little LEO operators such as Final Analysis will benefit the market. Cf. ORBCOMM Application for Review at 12 n.27 (citing *Motorola, Inc. and American Mobile Satellite Co.*, DA 98-514 (rel. Mar. 16, 1998) ("*AMSC-ARDIS Merger Order*"). The Commission's finding in the *AMSC-Ardis Merger* decision was based on a finding that *terrestrial*, not satellite-based, mobile data communications are already competitive, and it expressly stated that "relatively few consumers would presently regard the [terrestrial mobile] services offered by Ardis and [satellite-based services of] AMSC as close substitutes for one another." *AMSC-ARDIS Merger Order* at ¶ 61.

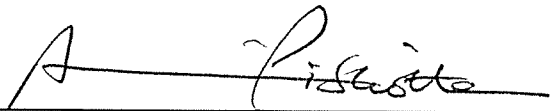
good-faith efforts to coordinate with ORBCOMM and post-licensing coordination is sufficient to address co-existence of Final Analysis and ORBCOMM in the uplink band. More important, as the first round Little LEO licensee with the largest operating commercial system, ORBCOMM obviously benefits from delaying entry of competitors for as long as possible. With that self-interest in view, it would be improper for the Commission to allow ORBCOMM to delay the licensing of Final Analysis based on ORBCOMM's definition of how and when the 148-149.9 MHz uplink band is sufficiently coordinated.

V. CONCLUSION

WHEREFORE, Final Analysis urges the Commission to reject ORBCOMM's Application for Review and affirm the *Licensing Order* to the extent described above, in the public interest, convenience and necessity.

Respectfully submitted,

FINAL ANALYSIS COMMUNICATION SERVICES, INC.

By: 
Aileen A. Pisciotta
Peter A. Batacan
KELLEY DRYE & WARREN LLP
1200 19th Street, N.W., Suite 500
Washington, D.C. 20036
(202) 955-9600

Its Attorneys

Dated: May 18, 1998

ATTACHMENT



REC'D FEB 23 1998
FINAL ANALYSIS COMMUNICATION SERVICES
9701-E PHILADELPHIA COURT
LANHAM, MARYLAND, 20706-4400
301-459-4100
FAX 301-459-0101

February 20, 1998

Ref: FACS-98-052

Mr. Alan L. Parker
Executive Vice President
Orbital Communications Corporation
2455 Horse Pen Road
Herndon, Virginia 20171

Re: Your Letter Dated February 10, 1998

Dear Alan:

I would like to thank you for taking the time to write to me at what must be a very busy time for you and your colleagues at Orbcomm with the early orbit operation of your constellation and your marketing and sales activities around the world.

However, we are perplexed by your letter. As you know, Final Analysis hosted the first coordination meeting with your senior technical staff here last December. We would be happy to host the second meeting as well. However it had been our understanding that Orbcomm had offered to host and prepare the next coordination meeting. Furthermore, at your staff's request our technical teams agreed to allow Orbcomm some extra time to prepare for this meeting because of Orbcomm's busy launch schedule.

Our first coordination meeting on technical issues was a very fruitful exchange of ideas and plans for future sharing collaboration. As Orbcomm and Final Analysis appear to be further ahead than other applicants in their systems development, we believe that continuation of bilateral meetings would be most useful at this time.

Our Chief Engineer, Dave Grimes, has been in contact with Paul Locke to discuss the next coordination meeting. As the matters to be discussed are only technical without any apparent political overtones, I am sure that our two engineering teams can arrive at a successful coordination, and we are eager to continue our mutual discussions on this topic. However, I must take exception to your comment that this coordination should drive the completion of the second round licensing process, as Orbcomm (a first round licensee) has still not completed its coordination with NOAA. Having reviewed the Leo One license, I must conclude that the FCC agrees with our position.

Mr. Alan L. Parker
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Please feel free to call me directly to discuss this or any other issue.

Sincerely,

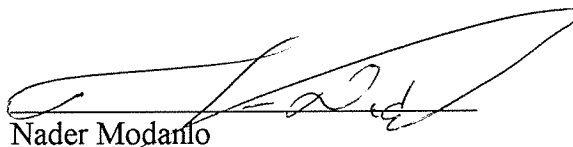
A handwritten signature in black ink, appearing to read "Nader Modanlo". The signature is fluid and cursive, with a long, sweeping horizontal stroke at the top that extends across the width of the signature.

Nader Modanlo
President and Chairman

cc: Tom Tycz
Harry Ng
Cassandra Thomas
Tania W. Hanna
Alexandra Field
Alex Royblat
Dan Connors
Leslie Taylor
Aileen Pisciotta
Joe Godles
Robert Mazer
Steve Goodman
Fred Thompson

Declaration

Pursuant to Section 1.16 of the Commission's rules, 47 C.F.R. & 1.16, I, Nader Modanlo, Chairman and President of Final Analysis Communication Services, Inc., hereby submit this declaration in support of the foregoing Opposition to the Application for Review filed by Orbital Communications Corp.. I have read the Opposition and the statements contained therein are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.



Nader Modanlo
Chairman and President
Final Analysis Communication Services, Inc.

Executed on: May 18, 1998

CERTIFICATE OF SERVICE

I, Beatriz Viera, hereby certify that a true and correct copy of the foregoing “**Opposition to Application for Review of ORBCOMM**” on behalf of Final Analysis Communication Services, Inc. was delivered by hand or regular mail this 18th day of May 1998, to each of the following:

Chairman William E. Kennard*
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Commissioner Gloria Tristani*
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, D.C. 20554

Commissioner Harold W. Furchtgott-Roth*
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554

Commissioner Susan Ness*
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

Commissioner Michael K. Powell*
Federal Communications Commission
1919 M Street, N.W. Room 844
Washington, D.C. 20554

Mr. Thomas Tycz*
Chief Satellite Division
Federal Communications Commission
2000 M Street, N.W., Room 811
Washington, D.C. 20054

Ms. Cassandra Thomas*
Deputy Chief, International Bureau
Federal Communications Commission
2000 M Street, N.W., Room 810
Washington, D.C. 20554

Ms. Regina Keeney*
Chief, International Bureau
Federal Communications Commission
2000 M Street, N.W., Room 830
Washington, D.C. 20554

Ms. Tania Hanna*
International Bureau
Federal Communications Commission
2000 M Street, N.W., Room 800
Washington, D.C. 20554

Mr. Harold Ng*
Chief, Satellite Engineering Branch
Satellite and Radio Communication Div.
International Bureau
Federal Communications Commission
2000 M Street, N.W., Room 801
Washington, D.C. 20554

Mr. Alex Roytblat*
Satellite and Radio Communication Div.
International Bureau
Federal Communications Commission
2000 M Street, N.W., Room 500
Washington, D.C. 20554

Stephen Goodman, Esq.
Halprin, Temple & Goodman
Suite 650 East
1100 New York Avenue, N.W.
Washington, D.C. 20005
Counsel for ORBCOMM

Henry Goldberg, Esq.
Joseph Godles, Esq.
Mary Dent, Esq.
Goldberg, Godles, Wiener & Wright
1229 19th Street, N.W.
Washington, D.C. 20036
Counsel for Volunteers in Technical
Assistance

Robert A. Mazer, Esq.
Vinson & Elkins
1455 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-1008
Counsel for Leo One USA

Leslie Taylor, Esq.
Leslie Taylor Associates, Inc.
6800 Carlynn Court
Bethesda, MD 20817-4302
Counsel for E-Sat

Mr. Nelson Pollack
AFFMA
4040 North Fairfax Drive, Suite 204
Arlington, VA 22203-1613

Mr. Richard Barth
U.S. Department of Commerce
National Oceanic and Atmospheric
Administration
Office of Radio Frequency Management
Room 2246, SSMC-2
1325 East West Highway
Silver Spring, MD 20910

Mr. William T. Hatch
Associate Administrator
Spectrum Management
U.S. Department of Commerce
National Telecommunications and
Information Administration
14th and Constitution Avenue, N.W.
Washington, D.C. 20230

Kira Alvarez, Esq.
Attorney Advisor
Office of General Counsel
National Atmospheric and Oceanic Adm.
(Dept. of Commerce)
1325 East-West Highway 18111
Silver Spring, MD 20910

SMC/CIIS
Attn: Lt. Dave Meyer
2420 Vela Way, Suite 1467-A8
Los Angeles AFB
El Segundo, CA 90245-4659



Beatriz Viera

* Hand Delivered