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March 24, 1998

Ms. Regina Keeney
Chief, International Bureau
Federal Communications Commission
2000 M Street, N.W., Room 858
Washington, D.C. 20554

Re: Final Analysis Communications Services, Inc.
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. Keeney:

On March 16, 1998, Final Analysis Communications Services, Inc. ("Final Analysis") provided the Commission with its response to news reports suggesting that the Russian Space Agency ("RSA") had taken actions rendering uncertain the ability of Polyot Design Bureau ("Polyot") to provide no-cost launch services to Final Analysis. In its letter, Final Analysis asserted, among other things, that "Polyot remains ready, willing, and able to providing [sic] the agreed-upon launch vehicles under the existing barter arrangement." The letter further characterized as "completely inaccurate" reports that the RSA's revocation of Polyot's "right to market its launch vehicles . . . would adversely impact Final Analysis' relationship with Polyot."

On March 20, 1998, we commented on Final Analysis' March 16 letter on behalf of Leo One USA Corporation ("Leo One USA").¹ We noted that any Commission action on Final Analysis' pending application without input from the RSA could be interpreted as impinging on the authority of the RSA acting within its own country, and it was therefore incumbent upon the Commission to request the RSA itself to advise the Commission about the current legal requirements that Final

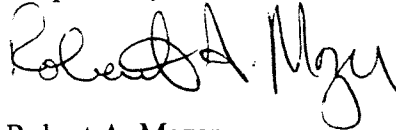
¹ Leo One USA is a party of interest in this matter given the technical implications on the Leo One USA system of the Final Analysis October 30, 1997 system amendment. (See Leo One USA Petition to Deny, filed December 4, 1997). Leo One USA also has an interest here given its secondary status on certain spectrum designated for the Final Analysis system in the *Report and Order* in IB Docket No. 96-220 (released October 15, 1997). Additionally, it has an interest in preventing any applicant from warehousing spectrum. This is particularly important here because Final Analysis has certain rights to any Little LEO spectrum allocated in the future.

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Analysis and Polyot must satisfy in order to implement their arrangement and whether those companies have secured the necessary licenses and other authority for that purpose.

Leo One USA, in the course of undertaking its own due diligence on Russian launch services for the Leo One USA system, has obtained the attached (i) copy of a letter (together with a translation) signed by Y. N. Koptev, head of the RSA, regarding the current authority of Polyot to implement launch service agreements, and (ii) translation of Decision of Government of the Russian Federation No. 104 of February 2, 1996, which defines the broad scope of the authority of the RSA over space activities. These documents, which obviously were not prepared for the purpose of this proceeding, raise further questions about the assertions in Final Analysis' March 16 letter, and thus highlight the need for the Commission to contact the RSA directly for the facts.

Respectfully submitted,



Robert A. Mazer
Albert Shuldiner
Counsel to Leo One USA Corporation

RAM:dks
Enclosure

cc: Cassandra Thomas
Daniel Conners
Tania Hanna
Joseph Heaps
Parties of Record



**ГЕНЕРАЛЬНЫЙ ДИРЕКТОР
РОССИЙСКОГО КОСМИЧЕСКОГО
АГЕНТСТВА**

Генеральному директору
производственного объединения "Полет"
О.П.Дорофееву

"10" сентября 1995 г.

№ КОС. 21-882

644021 г.Омск, ул.Богдана Хмельницкого, 226

Москва

Уведомление об аннулировании лицензий

Российское космическое агентство, руководствуясь "Положением о лицензировании космической деятельности", утвержденным постановлением Правительства Российской Федерации от 2 февраля 1996 года № 104, на основании решения Арбитражного суда Омской области от 7 сентября 1997 года, признавшим недействительным постановление Главы Администрации Октябрьского района г.Омска "О регистрации предприятия Конструкторского бюро ПО "Полет" от 27 января 1993 г. №80, приняло решение об аннулировании лицензий Конструкторскому бюро ПО "Полет" № 51 от 25 марта 1994 г., №№ 263, 265 от 27 мая 1997г. Лицензии подлежат возврату в РКА.

О принятом РКА решении прошу проинформировать всех юридических лиц (в том числе зарубежных), имеющих договорные отношения с КБ ПО "Полет".

Одновременно довожу до Вашего сведения, что все юридические лица, учредителями которых является ПО "Полет", и занимающиеся космической деятельностью, должны получить разрешение РКА на эту деятельность.

Ю. Н. Коптев