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January 2, 1998

VIA HAND DELIVERY

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

Re:

Iridium LLC

Application for authority to launch and operate

the MACROCELL MSS satellite system

File No.187-SAT-P/LA-97 Motion for Extension

Dear Ms. Salas:

Transmitted herewith, on behalf of Iridium LLC, are an original and four copies of a Motion For Extension of Time filed in connection with the above-referenced application.

If questions arise, please contact the undersigned attorney.

Sincerely,

Ann Bavender

Counsel for Iridium LLC

**Enclosure** 

Courtesy Copy: Thomas Tycz, FCC (w/encl.)(via hand)

Attached Service List CC:

FRANK U. FLETCHER (1939-1985) ROBERT L. HEALD (1956-1983) PAUL D.P. SPEARMAN (1936-1962) FRANK ROBERSON (1936-1961) RUSSELL ROWELL (1948-1977)

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## BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

In re Application of

IRIDIUM LLC

For Authority to Launch and Operate the MACROCELL Mobile Satellite System in the 2 GHz Band File No. 187-SAT-P/LA-97

To: Chief, Satellite and Radiocommunication Division, International Bureau

## MOTION FOR EXTENSION OF TIME

Iridium LLC ("Iridium"), by its attorneys and pursuant to Section 1.46 of the Commission's rules, hereby respectfully requests an extension of time until February 13, 1998, to oppose petitions to deny and reply to comments filed on December 22, 1997 in connection with its above-captioned application for authority to launch and operate the MACROCELL mobile satellite system ("Iridium application"). In support thereof, the following is submitted:

 Iridium requests the extension to respond to petitions and comments filed in response to a Commission Public Notice (Report No. SPB-106, DA 97-2202)
 released on October 15, 1997, which accepted for filing and solicited petitions and comments regarding the Iridium application, <sup>1</sup> and a subsequent Public Notice (DA 97-2496) released on November 26, 1997, which extended until December 22, 1997 the date for filing petitions and comments regarding the application and until January 12, 1998 the date for filing oppositions and replies to the petitions and comments. As of this date, Iridium has received a petition to deny its application filed by Hughes Communications Galaxy, Inc. and five comments regarding its application filed by KaStar Satellite Communications Corp., the Fixed Point-To-Point Communications Section of the Wireless Communications Division of the Telecommunications Industry Association, Lockheed Martin Corporation, Cellular Vision USA, Inc., and ICO Services Limited.

2. An extension in which to respond to the petition and comments is warranted since the period between the petition/comment filing date and the current opposition/reply filing date includes three Federal holidays, in addition to various other holidays. Many of these holidays fell shortly after the December 22, 1997 petition/comment filing date. As a result, service upon Iridium of petitions and comments regarding the Iridium application was delayed. In fact, one of the petitions/comments filed December 22, 1997 was not received by Iridium until December 30, 1997 and additional comments may yet be received. In addition, since two previously filed pleadings relating to Iridium's application were served on Iridium at the wrong address, it is possible that pleadings filed on December 22, 1997 were similarly served at the wrong address and have not yet been forwarded to Iridium. This

<sup>&</sup>lt;sup>1</sup>Petitions and comments were due on December 1, 1997, and oppositions and replies on December 22, 1997.

is of particular concern as no petitions/comments regarding the Iridium application have yet been made available by the Commission or commercial document services due to the shortages of staff working during the holiday season. In light of these facts, Iridium cannot yet be sure that it has received all petitions and comments regarding its application.<sup>2</sup>

- 2. The requested extension is essential in light of the highly technical nature of the issues addressed in the petition to deny and five comments Iridium has received. The complexity of the issues requires that Iridium's technical experts expend substantial additional time in order to adequately analyze and prepare a meaningful response to the petition and comments. Disruption of the work schedules of Iridium's technical experts during the holiday period has also made it difficult for Iridium's technical experts to complete their analysis of the petition and comments and confer regarding responses to them.<sup>3</sup>
- 4. The requested extension will not unduly delay the processing of the applications and, as pointed out by Motorola in its extension request referenced below, is much shorter than the nine week extension granted to the parties filing petitions and comments.

<sup>&</sup>lt;sup>2</sup>Iridium is serving this motion on those parties from which it has thus far received petitions or comments regarding the Iridium application.

<sup>&</sup>lt;sup>3</sup>Further, Iridium's Assistant General Counsel for Regulatory and Trade Policy, who has primary responsibility for responding to petitions and comments regarding Iridium's application, has been ill and unable to work since the petitions and comments were filed and will be out of the office until at least January 5, 1998, only one week before the oppositions/replies are currently due.

WHEREFORE, for the foregoing reasons, an extension of time until February 13, 1998 is requested for Iridium to oppose petitions and reply to comments filed December 22, 1997 in connection with its above-captioned application.<sup>4</sup>

Respectfully submitted,

IRIDIUM LLC

James P. Riley

Frank R. Jazzo Eric Fishman Ann Bavender

Its Attorneys

Fletcher, Heald & Hildreth, P.L.C. 1300 North 17th Street, 11th Floor Rosslyn, VA 22209 (703) 812-0400

January 2, 1998

<sup>&</sup>lt;sup>4</sup>On December 30, 1997, Motorola Global Communications, Inc. ("Motorola") filed a Motion For Extension Of Time requesting until February 13, 1998 to reply to petitions and comments filed on December 22, 1997 in response to the above-cited public notices in connection with its applications for authority to launch and operate the Celestri Multimedia LEO System (File No. 79-SAT-P/LA-97(63)) and the Celestri GEO System (File Nos. 94--98-SAT-P/LA-97). Iridium has no objection to a consolidated opposition/reply date for all parties responding to petitions and comments filed pursuant to the above-cited public notices.

## **CERTIFICATE OF SERVICE**

I, Judy Ryan, an employee of the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that on this 2nd day of January, 1998, a copy of the foregoing Motion For Extension of Time was served upon the following:

Via U.S. First Class Mail, prepaid: John P. Janka, Esq. Abid R. Qureshi, Esq. Latham & Watkins 1001 Pennsylvania Avenue, N.W., Suite 1300 Washington, DC 20004

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