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Before the
Federal Communications Commission
Washington, DC 20554

Received

OCT 23 2001

DirectCom Networks, Inc.

For Authorization to Construct, Launch
and Operate a System of Two Ka-Band
Satellites in the Fixed Satellite Service

File Nos. SAT-LOA-1997-122-00214;00215

International Bureau

DA 01-1693

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OCT 22 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Motion for Leave To File Reply

DirectCom Networks, Inc. ("DirectCom"), by its attorneys, requests leave to file the attached Reply to CAI Data System's ("CAI's") late-filed "Opposition" to DirectCom's Petition for Reconsideration ("Petition") of the matters referenced above.

Under the Commission's rules, interested parties had until September 19, 2001 to file an opposition to DirectCom's Petition, which was submitted on September 4, 2001 and served by mail on all parties to the Ka-band GSO proceeding, including CAI.¹ One party, Pegasus Development Corp. ("Pegasus"), timely filed a pleading styled "Opposition." Contrary to the rules, CAI filed its Opposition on October 1, 2001, and served a copy on DirectCom by mail. Moreover, DirectCom did not receive CAI's Opposition until after the October 4, 2001 due date for filing its response to Pegasus. Consequently, DirectCom has not had an opportunity to reply to CAI's allegations.

¹ 47 C.F.R. §1.106(g); 47 C.F.R. §1.4(h).

CAI's Opposition is procedurally defective and should be dismissed without consideration. Should the Commission nevertheless consider the Opposition, DirectCom requests leave to file a Reply to CAI in order to ensure a complete record in this proceeding.

Respectfully submitted,

DIRECTCOM NETWORKS, INC.

By: _____

Todd M. Stansbury

Jennifer D. Hindin

of

WILEY REIN & FIELDING LLP

1776 K Street, N.W.

Washington, DC 20006

202.719.7000

Its Attorneys

October 22, 2001

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2001, I caused a copy of the foregoing **Motion for Leave To File Reply** to be delivered by first class mail, postage pre-paid, to the following:

John P. Stern
Associate General Counsel
Loral Space & Communications Ltd.
1755 Jefferson Davis Highway, Suite 1007
Arlington, VA 22202

Dave Brown
General Counsel
KaStarCom World Satellite, LLC
4500 S. Syracuse St. #5000
Denver, CO 80237

Stephen D. Baruch, Esq.
Leventhal, Senter & Lerman
2000 K Street, N.W., Suite 600
Washington, DC 20006-1809
Attorneys for TRW Inc.

Brian D. Weimer, Esq.
Skadden Arps Slate Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, DC 20005
Attorneys for Celsat America, Inc.

John P. Janka, Esq.
Arthur S. Landerholm, Esq.
Latham & Watkins
1001 Pennsylvania Avenue, N.W., Suite 1300
Washington, DC 20004
*Attorneys for Hughes Communications,
Inc.*

Tara K. Giunta, Esq.
Coudert Brothers
1627 Eye Street, N.W., 12th Floor
Washington, DC 20006
*Attorneys for Pacific Century
Group, Inc.*

Bruce D. Jacobs, Esq.
Tony Lin, Esq.
Shaw Pittman
2500 N. St. N.W.
Washington, DC 20037
*Attorney for Pegasus Development
Corporation*

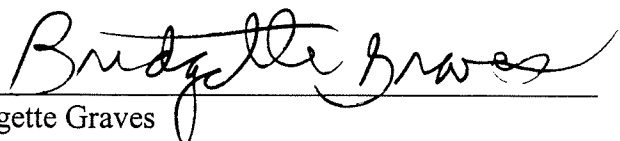
Raymond G. Bender, Jr., Esq.
Carlos M. Nalda, Esq.
Dow Lohnes & Albertson PLLC
1200 New Hampshire Ave., N.W., Suite 800
Washington, DC 20036
*Attorneys for Lockheed Martin
Corporation*

Henry Goldberg, Esq.
Joseph A. Godles, Esq.
Mary A. Dent, Esq.
Goldberg, Godles, Wiener & Wright
1229 Nineteenth Street, N.W.
Washington, DC 20036
Attorneys for PanAmSat Corporation

Peter A. Rohrbach, Esq.
Karis Hastings, Esq.
Hogan & Hartson L.L.P.
555 Thirteenth Street, N.W.
Washington, DC 20004
*Attorneys for GE American
Communications, Inc.*

James M. Talens, Esq.
Michael D. Nilsson
Steptoe & Johnson LLP
1330 Connecticut Avenue N.W.
Washington, DC 20036
Attorneys for Motorola, Inc.

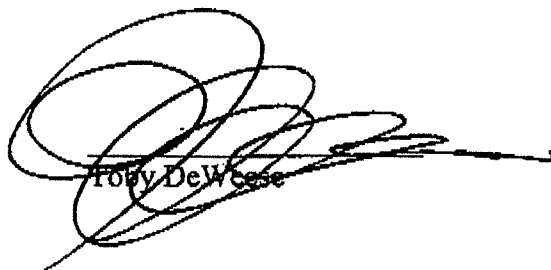
James U. Troup
Arter & Hadden LLP
1801 K Street, N.W., Suite 400K
Washington, DC 20036
Attorneys for CAI Data Systems, Inc.


Bridgette Graves

DECLARATION OF TOBY DEWEESE

I, Toby DeWeese, hereby declare under penalty of perjury as follows:

1. I am Vice President Corporate Development of DirectCom Networks, Inc. ("DirectCom"), which holds a license for Ka-band satellites at 123° W.L. and 127° W.L.
2. DirectCom has filed a Petition for Reconsideration ("Petition") which urges the International Bureau to reconsider its decision that the 127° W.L. orbital location is capable of providing full-CONUS service, and to grant DirectCom a right of first refusal with respect to a full-CONUS Ka-band slot with U.S. ITU-date priority that may become available in the future.
3. In the event the Bureau grants the Petition as requested, DirectCom will not exercise the right it receives as a result of such grant to seek consent to reassign the satellite currently licensed at 127° W.L. to the 87° W.L. orbital location.



Toby DeWeese

October 22, 2001

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2001, I caused a copy of the foregoing Petition for Partial Reconsideration to be delivered by first class mail, postage pre-paid, to the following:

John P. Stern
Associate General Counsel
Loral Space & Communications Ltd.
1755 Jefferson Davis Highway, Suite 1007
Arlington, VA 22202

Dave Brown
General Counsel
KaStarCom World Satellite, LLC
4500 S. Syracuse St. #5000
Denver, CO 80237

Stephen D. Baruch, Esq.
Leventhal, Senter & Lerman
2000 K Street, N.W., Suite 600
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1440 New York Avenue, N.W.
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Tony Lin, Esq.
Shaw Pittman
2500 N. St. N.W.
Washington, DC 20037
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Carlos M. Nalda, Esq.
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Karis Hastings, Esq.
Hogan & Hartson L.L.P.
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Steptoe & Johnson LLP
1330 Connecticut Avenue N.W.
Washington, DC 20036
Attorneys for Motorola, Inc.

James U. Troup
Arter & Hadden LLP
1801 K Street, N.W., Suite 400K
Washington, DC 20036
Attorneys for CAI Data Systems, Inc.



Bridgette Grayes