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September 21, 2010

VIA IBFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Open Range Communications Inc. (File No. SAT-STA-20100625-00147)

Dear Ms. Dortch:

Please see the enclosed request for reconsideration submitted by Open Range Communications Inc.

Respectfully submitted,

/s/ Joe D. Edge _____

Joe D. Edge
Counsel for
Open Range Communications Inc.

JDE/cf

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Ms. Mindel De La Torre
Chief, International Bureau

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Ms. Ruth Milkman
Chief, Wireless Telecommunications Bureau

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Mr. Julius Knapp
Chief, Office of Engineering and Technology

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WASHINGTON D.C.

WISCONSIN

Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: Open Range Communications Inc.
SAT-STA-20100625-00147**

Dear Ms. De La Torre, Ms. Milkman, and Mr. Knapp:

On June 25, 2010 Open Range Communications Inc. requested Special Temporary Authority (STA) to continue operating Ancillary Terrestrial Component (ATC) facilities on spectrum (2483.5-2495 MHz) licensed to Globalstar Licensee LLC. On September 14, 2010 the Bureaus granted the Open Range request for a period of 60 days subject to certain conditions. Although Open Range believed initially that the authority granted would allow the company to continue to operate and execute its plan it subsequently determined that the 60 day period would provide insufficient time to maintain a viable business. Because that outcome would be inconsistent with what Open Range believes to be the underlying purpose of the STA, Open Range respectfully requests reconsideration of certain of the terms of the STA to ensure that its underlying purposes will be achieved.

The requested alteration would change the grant in two ways. First Open Range requests that the term be changed to 180 days in lieu of the 60 days currently granted. In addition Open Range requests that the performance milestone included in the grant be altered so that Open Range would not be required to "enter into" an alternative spectrum agreement by the end of the 180 day period. Open Range is actively pursuing an alternative spectrum arrangement with possible spectrum providers. Although these discussions have been fruitful Open Range is concerned that it may not be able to reach a definitive agreement within the 180 day period.

Ms. Mindel De La Torre
Ms. Ruth Milkman
Mr. Julius Knapp
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In connection with any grant of Special Temporary Authority, Open Range would commit to provide monthly reports to the Commission on the status of its efforts to secure alternative spectrum. Open Range would also agree to make a voluntary contribution to the U.S. Treasury of the lease payments that would otherwise be due to Globalstar for the relevant time period under the parties' spectrum lease to the extent that Open Range does not also have to make such payments to Globalstar.

Open Range understands that the authority granted pursuant to the STA is limited to those 264 markets identified in Attachment A to the Open Range submission of September 13, 2010 as "Built" or "Construction-in-Progress" which currently ("DEC 2010 HH") represents an estimated 1,816,083 households. Open Range will not seek to obtain STA authority to operate in additional markets. Open Range would also commit that during the term of the STA Open Range shall comply with all limitations and restrictions in its RUS Loan Agreement relating to the payment of any dividend, stock, capital, capital credit or other distribution in the nature of an investment, guarantee, extension of credit, loan or advance payment on obligations (collectively called "distributions") to any of its shareholders. The practical effect of this restriction is that Open Range may not pay a dividend or make a distribution to any of its equity holders during this period.

Open Range believes that alteration of the terms of the STA as described herein would serve the public interest by substantially enhancing the likelihood that Open Range will be able to secure alternative spectrum and by ensuring that Open Range can continue to serve its customers and deploy its network while those negotiations are underway. Absent the additional time Open Range is concerned that it may not be able to continue operating and that the underlying purposes to be served by the STA would not be achieved.

Respectfully submitted,

/s/ Joe D. Edge
Open Range Communications Inc.
by its attorney
Joe D. Edge

JDE/cf