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A LIMITED LIABILITY PARTNERSHIP

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NEW YORK, NY
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February 20 2002

BY HAND

William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Final Analysis Communication Services, Inc., Application for
Consent to Transfer of Control (File No. IB20022000105)

Dear Mr. Caton:

Enclosed on behalf of Final Analysis Communication Services, Inc. are the original and nine (9) copies of a Supplemental Statement to Exhibit A of the above-referenced application, filed on January 25, 2002. This Supplemental Statement is being filed at the request of the International Bureau. Please associate this Supplemental Statement with the original file for the application.

Please direct any questions to me.

Respectfully submitted,



Aileen A. Pisciotta
Counsel to
Final Analysis Communication Services, Inc.

Enc.

cc: Cassandra Thomas, International Bureau
JoAnn Lucanik, International Bureau



Received

FEB 26 2002

Satellite Policy Branch
International Bureau

EXHIBIT A
FINAL ANALYSIS COMMUNICATION SERVICES, INC.
REQUEST FOR CONSENT TO TRANSFER OF CONTROL

Supplemental Statement

The following information is provided in response to the specific questions posed in Question 40 of FCC Form 312.

The sole stockholder owning of record and/or voting 10 percent or more of the voting stock of New York Satellite Industries, LLC (“NYSI”) the proposed transferee of control of satellite licensee Final Analysis Communication Services, Inc., is:

<u>Name and Address</u>	<u>Citizenship</u>	<u>Equity</u>	<u>Votes</u>
Nader Modanlo 5 Crestview Court Potomac, Maryland 20854 301-251-0828	U.S.	100%	100%

The names and addresses of the officers and directors of NYSI are as follows:

Nader Modanlo, Managing Member



APPLICATION FOR SATELLITE SPACE AND EARTH STATION AUTHORIZATIONS FOR TRANSFER OF CONTROL OR ASSIGNMENT FCC 312 MAIN FORM FOR OFFICIAL USE [Click here for INSTRUCTIONS.]	FCC Use Only S2150 Final Analysis Communication Services, Inc. FACS-NGSO SAT-T/C-20020125-00010 IB2002000105
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Menu

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
 Application for consent to transfer control from Trustee to New York Satellite Industries, LLC

1-8. Legal Name of Applicant	
Name: Final Analysis Communication Services, Inc.	Phone Number: 3014594100 x0000210
DBA Name:	Fax Number: 3014590101
Street: 9701-E Philadelphia Ct.	E-Mail: pmahoney@finalanalysis.com
City: Lanham	State: MD
Country: USA	Zipcode: 20706 -4400
Attention: Patricia A Mahoney	
9-16. Name of Contact Representative (If other than applicant)	
Name: Aileen A. Pisciotta	Phone Number: 202 955-9771
Company: Kelley Drye & Warren LLP	Fax Number: 202 955-9792
Street: 1200 19th Street, NW Suite 500	E-Mail: apisciotta@kelleydrye.com
City: Washington	State: DC
Country: USA	Zipcode: 20036 -2423
Contact Title: Partner	Relationship: Legal Counsel

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.	(N/A) b1. Application for License of New Station (N/A) b2. Application for Registration of New Domestic Receive-Only Station (N/A) b3. Amendment to a Pending Application (N/A) b4. Modification of License or Registration <input type="radio"/> b5. Assignment of License or Registration <input checked="" type="radio"/> b6. Transfer of Control of License or Registration
a.	

<input type="radio"/> a1. Earth Station <input checked="" type="radio"/> a2. Space Station	(N/A) b7. Notification of Minor Modification (N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite (N/A) b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States (N/A) b10. Other (Please specify)
17c. Is a fee submitted with this application? <input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other (please explain):	
17d. Fee Classification A CZW Quantity 1 Fee Classification B Quantity	
18. If this filing is in reference to an existing station, enter: (a) Call sign of station: Not Applicable	19. If this filing is an amendment to a pending application enter: (a) Date pending application was filed: (b) File number of pending application: Not Applicable Not Applicable

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:	
<input type="checkbox"/> a. Fixed Satellite <input checked="" type="checkbox"/> b. Mobile Satellite <input type="checkbox"/> c. Radiodetermination Satellite <input type="checkbox"/> d. Earth Exploration Satellite <input type="checkbox"/> e. Direct to Home Fixed Satellite <input type="checkbox"/> f. Digital Audio Radio Service <input type="checkbox"/> g. Other (please specify)	
21. STATUS: Choose the button next to the applicable status. Choose only one. <input type="radio"/> Common Carrier <input checked="" type="radio"/> Non-Common Carrier	22. If earth station applicant, check all that apply. <input type="checkbox"/> Using U.S. licensed satellites <input type="checkbox"/> Using Non-U.S. licensed satellites
23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities: <input checked="" type="radio"/> Connected to a Public Switched Network <input type="radio"/> Not connected to a Public Switched Network <input checked="" type="radio"/> N/A	
24. FREQUENCY BAND(S): Place an "X" in the box(es) next to all applicable frequency band(s). <input type="checkbox"/> a. C-Band (4/6 GHz) <input type="checkbox"/> b. Ku-Band (12/14 GHz) <input checked="" type="checkbox"/> c. Other (Please specify upper and lower frequencies in MHz.) Frequency Lower: 137-138 MHz Frequency Upper: 400.15-401 MHz	

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- a. Fixed Earth Station
- b. Temporary-Fixed Earth Station
- c. 12/14 GHz VSAT Network
- d. Mobile Earth Station
- e. Geostationary Space Station
- f. Non-Geostationary Space
- g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY: Choose only one.

- Transmit/Receive Transmit-Only Receive-Only N/A

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an "X" in the box(es) next to all that apply.)

Not Applicable

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.

Yes No

Attachment

ALIEN OWNERSHIP

Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30-34.

29. Is the applicant a foreign government or the representative of any foreign government? Yes No N/A

30. Is the applicant an alien or the representative of an alien? Yes No N/A

31. Is the applicant a corporation organized under the laws of any foreign government? Yes No N/A

32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country? Yes No N/A

33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country? Yes No N/A

34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.

Attachment

BASIC QUALIFICATIONS

35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules? Yes No

If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.

Attachment

36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances. Yes No

Attachment

37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances. Yes No

Attachment

38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances Yes No

Attachment

39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances. Yes No

Attachment

40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.

Exhibit A

41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. *See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.* Yes No

42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43. Yes No

Attachment

42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?

43. Description. (Summarize the nature of the application and the services to be provided). Applicant seeks consent to transfer control of FCC license from bankruptcy Trustee to New York Satellite Industries, LLC. See Exhibits A and B.

Exhibit B

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the

regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing
Nader Modanlo

46. Title of Person Signing
Chairman and President

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

Form 312 Schedule A

Menu



SATELLITE EARTH STATION AUTHORIZATIONS
FCC Form 312 - Schedule A
FOR OFFICIAL USE ONLY
[INSTRUCTIONS]

Select one of the following

CONSENT TO TRANSFER OF CONTROL

 CONSENT TO ASSIGNMENT OF LICENSE
 NOTIFICATION OF TRANSFER OF CONTROL OF RECEIVE ONLY REGISTRATION

 NOTIFICATION OF ASSIGNMENT OF RECEIVE ONLY REGISTRATION

A1. Name of Licensee (as shown on FCC 312- Main Form)

Name: Final Analysis Communication Services, Inc. Phone Number: (301) 459-4100
 DBA Name: Fax Number: (301) 459-0101
 Street: 9701-E Philadelphia Court E-Mail: pmahoney@finalanalysis.com
 City: Lanham State: MD
 Country: USA Zipcode: 20706 -
 Attention: Patricia Mahoney

A8. List Callsign(s) of station(s) being assigned or transfered	A9. No. of station(s) listed
<input type="text" value="Enter Call Sign(s)"/>	1

A10. Name of Transferor / Assignor

Name: Cheryl E. Rose, Trustee for the Estate of Final Analysis Inc. Phone Number: (301) 838-2010
 Company: Fax Number:
 Street: 50 W. Edmonston Drive E-Mail:
 Suite 600
 City: Rockville State: MD
 Country: USA Zipcode: 20852 -
 Contact Relationship: SA
 Title:

A15. Name of Transferee/ Assignee

Name: New York Satellite Industries, LLC Phone Number: (301) 251-0828
 DBA Name: Fax Number:
 Street: 5 Crestview Court E-Mail:
 City: Potomac State: MA

Country: USA

Zipcode: 20854 -

Attention: Nader Modanlo

A20. If these facilities are licensed, is the transferee / assignee directly or indirectly controlled by any other entity? If yes, attach as Exhibit E, a statement (including organizational diagrams where appropriate) which fully and completely identifies the nature and extent of control including: (1) the name, address, citizenship, and primary business of the controlling entity and any intermediate subsidiaries or parties, and (2) the names, addresses, citizenship, and the percentages of voting and equity stock of those stockholders holding 10 percent or more of the controlling corporation's voting stock.

- Yes
- No
- N/A

[Attachment](#)

A21. If these facilities are licensed, attach as Exhibit F, a complete statement setting forth the facts which show how the assignment or transfer will serve the public interest.

[Exhibit F](#)

CERTIFICATION

- The undersigned, individually and for licensee, certifies that all attached exhibits pertain to Schedule A and all statement made in Schedule A of this application are true, complete and correct to the best of his/her knowledge and belief. The undersigned also certifies that any contracts or other instruments submitted herewith are complete and constitute the full agreement.
- The undersigned represents that stock will not be delivered and that control will not be transferred until the Commission's consent has been received, but that transfer of control or assignment of license will be completed within 60 days of Commission consent. The undersigned also acknowledges that the Commission must be notified by letter within 30 days of consummation.

A22. Printed Name of Licensee (Must agree with A1) Final Analysis Communication Services, Inc.	A24. Title (Office Held by Person Signing) Chairman and President
A26. Printed Name of License Transferor / Assignor (Must agree with A10) Cheryl E. Rose, Trustee for the Estate of Final Analysis Inc.	A28. Title (Office Held by Person Signing) Trustee
A26. Printed Name of License Transferee / Assignee (Must agree with A15) New York Satellite Industries, LLC	A28. Title (Office Held by Person Signing) Managing Member

[Previous](#)

[Menu](#)



SATELLITE EARTH STATION AUTHORIZATIONS
FCC Form 312 - Schedule A
FOR OFFICIAL USE ONLY
[INSTRUCTIONS]

1 copy of this form section exist.

Callsign: S2150 Callsign:
Callsign: Callsign:
Callsign: Callsign:
Callsign: Callsign:
Callsign: Callsign:

Previous

Menu

Nature of Application

This application, filed pursuant to Section 25.119(d) of the Commission's Rules, 47 C.F.R. § 25.119(d), seeks consent to the transfer of control of Final Analysis Communication Services, Inc. ("FACS" or the "Licensee"). Applicant also seeks expedited processing of this application consistent with treatment of *pro forma* transfer of control applications involving no substantial change in control.

FACS is a non-common carrier licensee in the Non-Voice, Non-Geostationary Mobile Satellite Services ("NVNG MSS") under the call sign S2150. *See Final Analysis Communication Services, Inc.*, Order and Authorization, 13 FCC Rcd 6618 (1998), Memorandum Opinion and Order, FCC 01-343 (rel. Dec. 3, 2001) ("FACS license"). FACS was established as a subsidiary of Final Analysis Inc. ("FAI"), a privately held for-profit Maryland corporation. The majority of voting stock of FACS was owned directly by FAI, with no intermediate subsidiaries.

Prior to the time that FAI entered into bankruptcy, Mr. Modanlo held *de jure* control of the licensee.¹ Mr. Modanlo is Chairman and President of the licensee, was Chairman and

¹ *See FCC Consent to Pro forma Transfer of Control*, File No. SAT-T/C-20000815-00120 (granted Sept. 5, 2000) (granting consent to a *pro forma* transfer of less than ten percent of the stock of FAI from its current shareholders, Nader Modanlo and Michael H. Ahan, to PO Polyot ("Polyot"), a corporation located in Omsk, Russia. Polyot would then execute an irrevocable proxy, including the grant by Polyot to Mr. Modanlo to vote Polyot's shares in FAI. The effect of these transactions was to grant Mr. Modanlo positive *de jure* control of FAI.). Subsequent to approval and consummation of the September 2000 transfer, the Polyot shares in FAI were redeemed and 9.56% of the total shares of FACS, constituting 13.98% of the voting shares, were issued to Polyot. The right to vote Polyot's shares in FACS are held in an irrevocable proxy granted to Mr. Modanlo, and thus Mr. Modanlo retained *de jure* control of FACS.

President of FAI and the licensee prior to the bankruptcy, and was subject to prior public interest review and approval by the Commission when the license was originally issued.

On September 14, 2001, a petition for involuntary Chapter 7 bankruptcy was filed in the United States Bankruptcy Court for the District of Maryland, Case Number 01-21039, to liquidate the assets of FAI. In an order issued October 24, 2001, that court appointed Cheryl Rose of Rockville, Maryland, as Trustee for FAI. This transferred control of FAI to the Trustee, and consequently resulted in the involuntary transfer of the ultimate control of FACS. Pursuant to Section 25.119(d) of the Commission's Rules, on November 5, 2001, FACS filed with this Commission an Application for Consent to Involuntary Transfer of Control (File No. SAT-T/C-20011105-00094), of FACS from FAI to the Trustee. That application is currently pending.

On January 14, 2002, the Trustee for FAI ("Transferor"), sold, assigned and transferred the assets and properties of FAI, including the stock of FACS, to New York Satellite Industries, LLC ("NYSI" or "Transferee"), a Delaware limited liability company also under the control of Nader Modanlo. Mr. Modanlo is the Managing Member of NYSI and currently holds 100% of its voting interests. Under the terms of the sale, the Transferor will retain control over the FACS stock and the license until such time as the Commission issues an order that consents to the transfer of control of FACS to the Transferee. *See* Bill of Sale attached as Exhibit B.

The transfer of control effected through this application will transfer all of the stock of FACS originally held by FAI, and then by the Trustee, to NYSI. The effect of these transactions is a non-substantial change in control of FACS because the same party, Mr. Modanlo, will have *de jure* control of the licensee both before and after the bankruptcy of the parent company, FAI. Therefore, this application should be accorded streamlined processing consistent with treatment of *pro forma* transfer of control applications involving no substantial change in control, or

otherwise processed on an expedited basis. As explained in the Statement of Public Interest attachment, it is critical for the licensee to return to normal operations as quickly as possible. Approval of this application will enable the company to reestablish continuity of management, which is essential for the successful completion and deployment of the FACS Little LEO system. For these reasons, expedited processing is requested.

BILL OF SALE

For good and sufficient consideration, receipt of which is hereby acknowledged, Cheryl E. Rose, Chapter 7 Trustee for Final Analysis, Inc., a Maryland corporation ("Seller") has SOLD, ASSIGNED and TRANSFERRED and by these presents does SELL, ASSIGN, TRANSFER, and DELIVER to New York Satellite Industries, LLC, a Delaware limited liability company, its successors and assigns ("Buyer"), effective as of January 14, 2002, all of Seller's right, title, and interest in and to each and all of the assets and properties of Seller described in Exhibit A hereto.

Seller hereby authorizes Buyer to immediately take any appropriate action in connection with any of these rights, claims, causes of action, and property, in its own or any other name, but at its own expense, upon execution of this Trustee's Bill of Sale.

TO HAVE AN TO HOLD, for itself and its successors and assigns, these rights, claims, causes of action, property and other assets described in Exhibit A hereto are sold, assigned and transferred "AS IS."

Seller hereby agrees to execute any documents, and to take all actions, reasonably requested by Buyer, at Buyer's expense, to effectuate and evidence the sale, assignment and transfer to Buyer of the Assets described in Exhibit A hereto.

Any individual, partnership, corporation, or other person or entity may rely without further inquiry upon the powers and rights herein granted to the Buyer and upon any notarization, certification verification, affidavit, or jurat by any notary public of any state relating to the authorization, execution, and delivery of this Bill of Sale or to the authenticity of any copy, conformed, or otherwise, hereof.

IN WITNESS WHEREOF, Seller has signed this Bill of Sale on the date first written above.

SELLER:

Cheryl E. Rose,
Cheryl E. Rose, Chapter 7 Trustee for the
Estate of Final Analysis, Inc.

FEDERAL COMMUNICATIONS COMMISSION

ADDENDUM

10

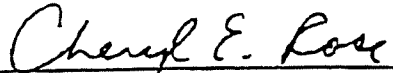
TRUSTEE'S BILL OF SALE

THIS ADDENDUM to the Trustee's Bill of Sale of even date herewith is made this 14th day of January, 2002.

In accordance with the Communications Act of 1934, as amended, Seller and Buyer agree that Seller shall retain control over the Federal Communications Commission ("FCC") license held by Final Analysis Communication Services, Inc. until such time as the FCC issues an order approving a transfer of control of the FCC license from Seller to Buyer. Seller shall cooperate and assist Buyer to effectuate the transfer of control.

IN WITNESS WHEREOF, Seller and Buyer have signed this Addendum to the Trustee's Bill of Sale on the date first written above.

SELLER:


Cheryl E. Rose, Chapter 7 Trustee

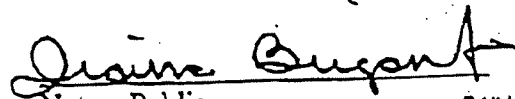
BUYER:


Nader Modanlo, Managing Member
New York Satellite Industries, LLC

STATE OF MARYLAND)
)
COUNTY OF Montgomery) SS:

On this the 14th day of January, 2002, before me, came Cheryl E. Rose, who is personally known to me, and being by me duly sworn, did desose and say that she is the Chapter 7 Trustee of Final Analysis, Inc., a Maryland corporation; and that she executed the foregoing and annexed Bill of Sale in her capacity as Chapter 7 Trustee on behalf of the estate of such corporation.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.


Notary Public

RAINA E. BRIGANTY,
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires January 15, 200

My Commission Expires: _____

Statement of Public Interest

Consent to the transfer of control requested in this application is in the public interest because it will best facilitate the implementation of the Final Analysis Communication Services, Inc. ("FACS") "Little LEO" system in accordance with its license. Approval of this application will enable licensee to return to normal operations and also will re-establish continuity of management, which is essential for the successful completion and deployment of licensee's system.

Nader Modanlo, the controlling party of the proposed Transferee, New York Satellite Industries, LLC ("NYSI"), is the same party who previously held ultimate control of the licensee through its parent company, FAI, and then gained direct control as majority voting shareholder of the licensee. Mr. Modanlo also maintained continuous day-to-day control of the licensee, even through the bankruptcy, as Chairman and President of FACS. Mr. Modanlo has already been subject to public interest review and approved by the Commission in the context of the original issuance of the license, thus, grant of the instant application does not create a substantial change in the control of the licensee, other than the fact that it will facilitate the emergence of FACS from its corporate parent's liquidation.

The proposed transfer of control to NYSI will enhance the overall capabilities of the licensee to enter and compete in the Little LEO marketplace. Currently, there is only one fully operational Little LEO system, ORBCOMM. FACS is poised to be a viable competitor to that system. Thus, grant of this application will facilitate achievement of the Commission's original objectives in granting the second round of Little LEO licenses, namely to ensure multiple service

providers in the Little LEO market. *See 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*, Report and Order, 13 FCC Rcd 9111, 9113 (¶ 2) (1997).

REC'D MELLON

JAN 25 2002

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

Wire Transfer - Processing Fee Payment

Approved by OMB

FEDERAL COMMUNICATIONS COM
REMITTANCE ADVIC

01-30-02 8210704 001

(1) LOCKBOX # 358210

SERVICE USE

FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)
Kelley Drye & Warren, LLP

(3) TOTAL AMOUNT PAID (U.S. Dollars and cents)
\$9,195.00

(4) STREET ADDRESS LINE NO. 1
1200 19th Street, N.W.

(5) STREET ADDRESS LINE NO. 2
Suite 500

(6) CITY
Washington

(7) STATE (8) ZIP CODE
DC 20036

(9) DAYTIME TELEPHONE NUMBER (include area code)
202 - 9559600

(10) COUNTRY CODE (if not in U.S.A.)
US

FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED

(11) PAYER (FRN)
0003 72 0158

(12) PAYER (TIN)
0135335107

IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)

(13) APPLICANT NAME
Final Analysis Communication Services, Inc.

(14) STREET ADDRESS LINE NO. 1
9701-E Philadelphia Ct.

(15) STREET ADDRESS LINE NO. 2

(16) CITY
Lanham

(17) STATE (18) ZIP CODE
MD 20706 -4400

(19) DAYTIME TELEPHONE NUMBER (include area code)
3014594100 x000

(20) COUNTRY CODE (if not in U.S.A.)
US

FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED

(21) APPLICANT (FRN)
0003 73 2583

(22) APPLICANT (TIN)
0521900790

COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET

(23A) CALL SIGN/OTHER ID

(24A) PAYMENT TYPE CODE (25A) QUANTITY
CZW 1

(26A) FEE DUE FOR (PTC)
\$9,195.00

(27A) TOTAL FEE
\$9,195.00 FCC USE ONLY

(28A) FCC CODE 1

(29A) FCC CODE 2

S2150

IB2002000105

(23B) CALL SIGN/OTHER ID

(24B) PAYMENT TYPE CODE (25B) QUANTITY

(26B) FEE DUE FOR (PTC)

(27B) TOTAL FEE FCC USE ONLY

(28B) FCC CODE 1

(29B) FCC CODE 2

SECTION D - CERTIFICATION

(30) CERTIFICATION STATEMENT

I, _____, certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief. SIGNATURE _____ DATE _____

SECTION E - CREDIT CARD PAYMENT INFORMATION

(31) MASTERCARD

MASTERCARD/VISA ACCOUNT NUMBER:

EXPIRATION DATE:

VISA

I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization herein described.

SIGNATURE _____ DATE _____