Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of

AMOCO PRODUCTION COMPANY Application for Earth Station Authority In the Domestic Satellite Service

) File No. SES-AMD-20030604-00776

MOTION FOR EXTENSION OF TIME

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Amoco Production Company ("Amoco"), by its counsel and pursuant to Section 1.46 of the Rules and Regulations of the Federal Communications Commission ("FCC" or "Commission"), hereby submits this Motion for Extension of Time to respond to the issues raised in the Supplement to Petition to Deny of PanAmSat Corporation ("Petition").

PanAmSat Corporation ("PanAmSat") filed its Petition on July 25, 2003 seeking clarification of the antenna alignment accuracy and a description of the installment procedures to be followed for a C-Band satellite earth station so that PanAmSat may evaluate the interference potential of Amoco's proposed operations.² Amoco, through Loral Skynet, its satellite service provider, is working to provide the necessary information to PanAmSat regarding the issues raised in the Petition.

¹ See Supplement to Petition to Deny of PanAmSat Corporation to Amoco Production Company Application for Earth Station Authority, File No. SES-AMD-20030604-00776, July 25, 2003 ("Petition").

² Petition at 3.

Amoco requests a thirty day extension of time to allow the parties to conduct a further evaluation of the interference potential of the proposed station, and for Amoco to supplement its amended application with any additional information determined to be necessary in response to the Petition.³ A grant of Amoco's motion will serve the public interest by promoting the private resolution of disputes and by postponing the need for the expenditure of further time and resources of the parties and of the Commission until such time as may actually be necessary.⁴

WHEREFORE, it is respectfully requested that the Commission grant Amoco a thirty-day extension of time to respond to the issues raised in the Supplement to Petition to Deny of PanAmSat Corporation.

Respectfully submitted,

AMOCO PRODUCTION COMPANY

By:

Wayne V. Black Katherine C. Lucas

Keller and Heckman LLP 1001 G Street, NW, Suite 500W Washington, DC 20001 (202) 434-4100 Its Attorneys

³ Amoco's counsel has discussed with PanAmSat's counsel its intention to request an extension of time, and PanAmSat's counsel agreed that it would not object to Amoco's request for additional time.

⁴ <u>See</u> MCI Worldcom Network Services, Inc., Complainant v. Allegiance Telecom, Inc., Defendant, *Order*, File No. EB-02-MDIC-0037, DA 03-478 (Feb. 24, 2003) (granting a Motion for Extension of Time to permit the parties to resolve the disputed issues); Farmers' and Business Mens' Telephone Co. v. AT&T Corp., *Order*, DA 03-170 (rel. Jan. 22, 2003).

CERTIFICATE OF SERVICE

I, Katherine C. Lucas, hereby certify that on this 7th day of August, 2003, a true

and correct copy of the Motion for Extension of Time of Amoco Production Company was

served via electronic mail or First-Class Mail, U.S. postage prepaid, as indicated below,

on the following parties:

Mr. Joseph A. Godles Goldberg, Godles, Wiener & Wright 1229 Nineteenth Street, N.W. Washington, DC 20036 Counsel for PanAmSat Corporation (via First Class Mail)

Ms. Jennifer Gilsenan International Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554 (via Electronic Mail)

Ms. Sylvia Lam International Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554 (via Electronic Mail)

Katheine Juero