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November 22, 2010

BY ELECTRONIC SUBMISSION

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Panasonic Avionics Corporation; Application for Blanket AES Operating Authority; File Nos. SES-LIC-20100805-00992, SES-AMD-20100914-01163 and SES-AMD-20101115-01432; Response to Notice Regarding Filing Deadlines

Dear Ms. Dortch:

Panasonic Avionics Corporation (“Panasonic”), through its undersigned attorney, hereby submits this response to the Row 44, Inc. (“Row 44”) Notice Regarding Filing Deadlines (“Notice”) dated November 19, 2010. Panasonic respectfully disagrees with the time frames calculated by Row 44 in the Notice, and objects to any extension of time for filing its so-called “consolidated response.”

As described in the Notice, on November 15, 2010, Panasonic filed its Response to Petition of Row 44, Inc. (“Response”) pursuant to Section 25.154(e) of the Commission’s rules. On the same day, Panasonic separately filed a minor amendment to its application for blanket AES operating authority and included the Response as an attachment to the application to provide the Commission staff with the context of the minor amendment.

In the Notice, Row 44 suggests that a reply to Panasonic’s Response “would be due within five (5) days of the deadline for filing the Response (see 47 C.F.R. § 1.45(c)), with an additional three (3) business days added because service was provided by mail. See 47 C.F.R. § 1.4(h)” – *i.e.*, on November 26, 2010.¹ Panasonic is not at all certain that such a reply pleading is contemplated by the rules but, assuming that the filing is permissible, Row 44 properly calculated the due date.

¹ Notice from David S. Keir to Marlene H. Dortch, Secretary, Federal Communications Commission dated November 19, 2010 (“Notice”) at 1.

However, Row 44 further claims a formal right to file an opposition to Panasonic's minor amendment pursuant to Section 1.45(b) of the Commission's rules. Row 44 suggests that it has ten (10) days to file the opposition, *plus an additional three (3) days under Section 1.4(h)* "for pleadings served by mail" – making the due date for the opposition December 1, 2010.² Row 44 has miscalculated its alternative due date. Again assuming Row 44 has a right to file an opposition pursuant to Section 1.45(b) relating to a minor amendment that has not and need not been placed on public notice, the opposition is actually due on November 26, 2010.

Panasonic's minor amendment was an application to the Commission filed electronically using FCC Form 312 and included attachments explaining the context of the application. Panasonic did not serve the application upon Row 44 or any other party. Section 1.4(h) of the rules states:

[i]f a document is *required to be served upon other parties by statute or Commission regulation and the document is in fact served by mail* (see § 1.47(f)), and the filing period for a response is 10 days or less, an additional 3 days (excluding holidays) will be allowed to all parties in the proceeding for filing a response.³

Because the minor amendment was not required to be served on any party and was not served on Row 44, it does not receive the additional three (3) days pursuant to Section 1.4(h). Counting ten (10) days from November 15, 2010, the date that Panasonic's minor amendment was filed, the Row 44 opposition – like its reply – is due by November 26, 2010.

Row 44 also requests, without rationale or any public interest basis whatsoever, "a limited extension of time and/or waiver of any applicable FCC rules" that may be necessary to permit "both" filings on its erroneous, preferred filing date.⁴ Although Panasonic does not object to Row 44's submission under Section 1.45(b), Panasonic objects to grant of an unsupported request for extension of time – particularly in circumstances where, as here, Row 44 merely notes that a public holiday falls within the reply period required by the rules. Grant of such an extension would require similar grants where public holidays, and even non-work weekend days, fall within the required reply period.

² *Id.* at 2. In any event, ten (10) days after November 15, 2010 is November 25, 2010. An additional three (3) business days would make the deadline November 30, 2010, not December 1, 2010. See 47 C.F.R. § 1.4(j) and Example 12.

³ 47 C.F.R. § 1.4(h) (emphasis added).

⁴ See Notice at 2.

In sum, should the Commission decide to accept Row 44's reply/opposition filing, the rules require that this pleading be submitted on November 26, 2010. Row 44 has provided no basis upon which to extend this due date.

Please feel free to contact me with any questions regarding this submission.

Sincerely,

Squire, Sanders & Dempsey L.L.P.

/s/ Carlos M. Nalda

Carlos M. Nalda

cc: David S. Keir, Counsel to Row 44, Inc.
Stephen Duall, FCC International Bureau
Paul Blais, FCC International Bureau