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

Federal Communications Commission  
Office of Secretary

In the Matter of )  
 )  
SkyWave Mobile Communications, Corp. )  
Application for Blanket License to )  
Operate Mobile Earth Terminals with )  
Inmarsat 4F2 at 52.75° W )

File No. SES-MFS-20051207-01709  
(Call Sign E030055)

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To: International Bureau

MAR 02 2006

Satellite Division  
International Bureau

MOTION TO ACCEPT LATE-FILED REPLY

SkyWave Mobile Communications, Corp. ("SkyWave") hereby files this Motion to Accept a Late-Filed Reply to the Opposition to Motion to Strike ("MSV Opposition") filed by Mobile Satellite Ventures Subsidiary LLC ("MSV") in the above-referenced application ("SkyWave Modification Application").

The deadline for SkyWave to file its Reply to the MSV Opposition was February 27, 2006. While every effort was made to file the Reply with the Commission on February 27, 2006, the Reply was not filed on February 27, 2006 due to an inadvertent miscommunication with the messenger service delivering the pleading to the Commission. Accordingly, SkyWave is filing the Reply today, February 28, 2006, along with this Motion.

SkyWave recognizes that late-filed pleadings are not routinely accepted by the Commission without good cause. SkyWave respectfully submits that the delay in filing the Reply with the Commission was inadvertent, and not intended to somehow deceive the Bureau, or MSV.<sup>1</sup> Further, there has not been undue prejudice to MSV -- a copy of the Reply was in fact

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<sup>1</sup> See *In the Matter of Lockheed Martin Corporation et al.*, 18 FCC Rcd. 16605, 16611 (2003) (dismissing a late-filed reply where it appeared a party intentionally filed its reply late, intentionally did not seek leave to file a late-filed pleading and did not serve the reply on parties to the proceeding).

sent by first class mail postage prepaid on February 27, 2006 to MSV. Further, the Commission's Rules do not contemplate an additional pleading by MSV in response to this Reply. As a result, the one day delay in filing this Reply has not hindered or affected MSV's ability to file a pleading in this matter. In contrast, rejecting the Reply would result in an incomplete record in this matter.<sup>2</sup>

SkyWave respectfully requests that its late-filed Reply be accepted by the Bureau. Acceptance of the Reply will not unduly prejudice MSV and will ensure a complete record in this matter.

Respectfully submitted,

**SkyWave Mobile Communications, Corp.**



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February 28, 2006

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<sup>2</sup> Late-filed pleadings have been accepted for purpose of creating a complete record in a proceeding. See, e.g., *In the Matter of Loral Satellite, Inc. and Loral Spacecom Corporation et al.*, 19 FCC Rcd. 2404, 2411 (2004) (accepting a late-filed petition filed with the International Bureau in order to create a "full and complete factual record"); see also *In the Matter of Application of Verizon Hawaii, Inc. et al.*, 19 FCC Rcd. 24110, 24111 (2004) (finding that the Wireless Bureau has "discretion to accept late-filed pleadings to develop a complete record").

## CERTIFICATE OF SERVICE

I, Marc A. Paul, an attorney with the law firm of Steptoe & Johnson LLP, hereby certify that on this 28th day of February, 2006, served a true copy of the foregoing Motion by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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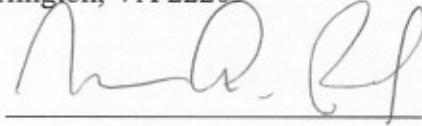
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