

November 18, 2005

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

Re: MCI, Inc.
Call Sign E000700
FCC File No. SES-MOD-20021125-02060
Request for 30-Day Extension of Time

SES-MOD-20021125-02060
File # Extension of disclosure statement, Express 3A
Call Sign E000700 Grant Date 12/6/05
(or other identifier)
From: 1/18/05 Term Dates 1/17/06
To:
Approved: [Signature] (202) 626-6615
Palicia Bravce
Chicago

VIA HAND DELIVERY



Dear Ms. Dortch:

MCI, Inc., pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, hereby requests a thirty day extension of time to file an amendment to its pending application to modify satellite earth station license E000700.¹

On June 21, 2004, the Commission released an order adopting new rules for mitigation of orbital debris.² The disclosure requirements for the orbital debris mitigation rules became effective on October 19, 2005.³ As a result, a deadline of November 18, 2005 was established for parties to file amendments to pending applications that include technical information necessitated by the new requirements.⁴

MCI's pending earth station application seeks authority to add the Express-3A satellite as a permanent point of communication for the provision of two-way voice and data Fixed Satellite Service between the United States and Russia, Azerbaijan and Cuba. The Express-3A satellite is not included on the Commission's permitted space station list and complete information regarding the orbital debris mitigation plans for the Express-3A satellite has not been filed with

¹ See FCC File No. SES-MOD-20021125-02060.

² See *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567 (2004).

³ See 70 Fed. Reg. 59,276 (Oct. 12, 2005).

⁴ See Public Notice, *International Bureau Satellite Division Information, Disclosure of Orbital Debris Mitigation Plans, Including Amendment of Pending Applications*, Report No. SPB-112, DA 05-2698 (Oct. 13, 2005).

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the Commission. MCI is therefore apparently required by the Commission's rules to file a description of the orbital debris mitigation plans for the Express-3A satellite as an amendment to its pending earth station application.

The Express-3A satellite is owned and operated by the Russian Satellite Communications Company ("RSCC"). As the Commission is aware, MCI has been working with the RSCC for more than a year to comply with the Commission's orbital debris mitigation disclosure requirements. As a result of MCI's efforts, the RSCC executed a letter that was filed with the Commission on December 14, 2004, which disclosed the RSCC's plans for disposal of the Express-3A satellite at the end of its useful life.⁵

MCI is continuing to work with the RSCC on compliance with the remainder of the Commission's orbital debris mitigation disclosure requirements. Working closely with the RSCC, a draft letter has been prepared, which includes the information required by the Commission's orbital debris mitigation disclosure rules.

The RSCC is currently reviewing the draft letter and may be in a position to execute the letter shortly. Until the RSCC completes its review, however, MCI cannot file a copy of the letter with the Commission as an amendment to its application.

Pursuant to Section 1.46 of the Commission's rules, it is the policy of the Commission that extensions of time shall not be routinely granted. An extension of time is warranted in this instance, however, for two reasons. First, the RSCC is a foreign corporation that does not conduct business in the United States. Although the RSCC operates the Express-3A satellite, MCI purchases capacity on the satellite from the International Organization of Space Communications ("Intersputnik"). MCI does not have a customer/supplier relationship with RSCC. Therefore, the RSCC's ultimate decision to execute a letter addressing the mitigation of orbital debris for the Express-3A satellite, and the timing of that decision, is outside of MCI's control.

Second, as the Commission is aware, MCI has been diligent in working with the RSCC to explain the importance of achieving compliance with the Commission's new information disclosure requirements. MCI was successful in securing an initial letter from the RSCC addressing the disposal orbit for the Express-3A satellite. The RSCC has provided MCI with no indication that it is unwilling to execute a second letter. In light of MCI's good faith efforts in this regard, a thirty day extension of time is warranted to permit MCI to secure a second

⁵ See Letter from V.P. Ganzhenko, Deputy General Director for Space Programs, RSCC, to I.A. Trifonov, Managing Partner, Squire, Sanders & Dempsey (Moscow) LLC (14 Dec. 2004), filed with FCC as an attachment to Letter from Bruce A. Olcott, Counsel to MCI/WorldCom, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission (Dec. 14, 2004).

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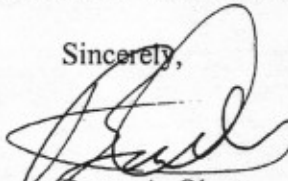
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executed letter from the RSCC and file the letter with the Commission as an amendment to its pending earth station application.

As required by Section 1.46(c) of the Commission's rules, MCI's counsel orally notified Stephen Dull and Curtrisha Banks of the Policy Branch of the Satellite Division of the International Bureau regarding the filing of this request for extension. Copies of this request were also provided to them by electronic mail.

Thank you for your attention to this matter. Please let us know if you have any questions.

Sincerely,



Bruce A. Olcott

**GRANT OF WAIVER AND REQUEST
FOR EXTENSION OF TIME TO FILE
ORBITAL DEBRIS MITIGATION PLANS**

**File Nos.: SES-MFS-20041206-01790 (NewCom International, Inc.);
SES-MOD-20021125-02060 (MCI, Inc.)**

On November 14 and 18, 2005, NewCom International, Inc. ("NewCom") and MCI, Inc. ("MCI") filed separate requests to waive the November 18, 2005, deadline to amend their pending applications by disclosing the orbital debris mitigation plans for their space segment, as required by the Commission's rules.¹ Both waiver requests involve the obtaining and submission of the orbital debris mitigation plans for the Express-3A spacecraft, licensed under the administration of the Russian Federation and operated by the Russian Satellite Communications Company.

We find that, in this instance, the public interest warrants waiver of the amendment deadline and an extension of time to file the orbital debris mitigation plans for the Express-3A spacecraft. Although MCI and NewCom request different time periods for the extension, we will grant an identical 60-day extension period to both parties because they are similarly situated.

Accordingly, MCI and NewCom will have 60-days from the deadline (that is, until January 17, 2006) to file an orbital debris amendment in the above-captioned files. Failure to file an amendment within this time period will result in the dismissal of the underlying applications.



Extension of disclosure statement

File # MCI - (Express 3A) SES-MOD-20021125-02060

Call Sign _____ Grant Date 12/6/05
(or other identifier)

Term Dates
From _____ To: 1/17/06

Approved: [Signature]
Policy Branch Chief

¹ See Public Notice, *International Bureau Satellite Division Information, Disclosure of Orbital Debris Mitigation Plans, Including Amendment of Pending Applications*, DA 05-2698 (Oct. 13, 2005); *Mitigation of Orbital Debris, Second Report and Order*, 19 FCC Rcd 11567 (2004).