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July 28, 2014

VIA ELECTRONIC FILING (IBFS)

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

Attention: International Bureau

Re: **SES-STA-20140630-00554**

Dear Ms. Dortch:

On behalf of KPAX Communications, LLC ("KPAX"), we hereby make this additional filing in support of a request for Special Temporary Authority ("STA") for a new transmit-only earth station. This filing is made to provide additional information and is filed at the request of International Bureau staff.

KPAX recently has undergone several internal reorganizations to entities within the ownership chain:

- KPAX recently converted from a corporation to limited liability company;
- KPAX's immediate parent entity (Cordillera Communications, LLC ("Cordillera")) also converted from a corporation to a limited liability company;
- KPAX's ultimate parent Evening Post Industries, Inc. ("EPI") distributed certain membership interests in Cordillera to EPI Preferred, LLC, a new wholly owned subsidiary of EPI.

The parties consummated each of these transactions on June 27, 2014.

Now, EPI is planning a second stage of its restructuring, which the company anticipates closing in the coming weeks. This phase of the restructuring is *pro forma* and will involve the creation of a new holding company above EPI controlled by the existing EPI shareholders.

KPAX filed its request for STA because it seeks immediate authority to begin operating a transmit-only earth station. But, given the multiple ownership changes that have occurred and remain ongoing, KPAX could not have filed an application for permanent



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authority for a new transmit-only earth station on Form 312 because the ownership information would have immediately become out of date. Instead, upon the informal advise of the Commission staff, KPAX filed a request for special temporary authority to operate the new earth station while EPI and KPAX complete their various internal reorganizations.

Upon closing of all of the relevant transactions, which EPI anticipates will be within a few weeks, KPAX will file a license application for permanent authority to operate the new earth station with the same parameters set forth in Form 312EZ, which accompanied the original request for STA filed on June 30, 2014. The application for permanent authority will specify the final ownership structure for KPAX and will not require further amendments or updates to revise the ownership.

Based on the foregoing, KPAX requests STA to operate the license for a period of 30 days while it completes its restructuring.

Please contact me if there are any questions.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be "R. Folliard", written over a light blue horizontal line.

Robert J. Folliard

Cc: Mr. Paul Blais (FCC) (via email)