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October 20, 2006

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By courier

Eleanor Lott  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Federal Communications Commission  
Bureau Office

File # SES-T/C-20060330-00569  
Call Sign E020312 Grant Date 10/26/2006  
(or other identifier)  
From As Requested Term Dates To  
Approved: Scott A. Kallen

**GRANTED**

Re: **SES T/C 20060330-00569-E020312**

Per Requirements for Change  
of Ownership of Receive Only  
Earth Stations

Dear Ms. Lott:

This letter is in response to your telephonic inquiry last week regarding my letter of October 6, 2006 regarding the above file and your subsequent discussion with Joshua Seidemann. In conformance with that discussion, Corona Holdings, Inc. ("Corona") by counsel, hereby seeks an extension of the 60-day (sixty day) deadline established by 47 CFR 25.119(f), and waiver of the 30-day (thirty day) notification requirement specified by that rule.

Corona entered into a series of transactions that involved the transfer of control of an earth station license. Corona filed FCC Form 312 on or about March 30, 2006, and the Commission granted authority to transfer control of the license effective April 11, 2006.

Unforeseen transactional issues involving internal corporate matters had the effect of delaying consummation of the transaction. A requirement to file a new Form 312 could cause additional delay if during the time the Commission needed to consider the newly-filed application the applicants would otherwise be able to consummate the transaction. Therefore, ABB respectfully requests extension of the 60-day consummation period since such extension will ultimately enable consummation of a transaction whose form the Commission has reviewed and approved.

The transaction closed on July 20, 2006. Due to an inadvertent oversight and reliance on electronic filing, this letter notice was not submitted within the 30-day time frame. On August 7, 2006, the applicant filed at the Commission notification of consummation of the underlying transaction with regard to authority to transfer control of domestic and international section 214 authorities (Attached). On or about August 7, 2006, Mr. Seidemann, also counsel to Corona, entered the IBFS system and verified that Schedule A of FCC Form 312 reflected "Notification of Transfer of Control of Receive Only Registration." As of October 12, 2006, the ULS website confirms that "Notification of Transfer" designation is marked, rather than


“Consent to Transfer of Control” (Attached). Counsel understood this difference to reflect that the Commission’s files had received electronically notification of the consummation in the same manner as which the Form 312 had been originally filed. Counsel noted at that time that the status/ref no. of that application was listed as “Filed – Pending Fee Verification,” but attributed this to the same sort of apparent possible system error that had continued to post “Pending Fee Verification” even after payment had been received by the Commission for the initial filing of Form 312.

Counsel subsequently became aware that notification of the consummation had not been received at the Commission, and undertook to submit a letter timely seeking waiver of the requirement based upon the inadvertent oversight and reliance on electronic filing. Mr. Seidemann is no longer representing Corona.

Accordingly, and the reasons stated above, the applicant requests an extension of the 60-day consummation deadline of 47 CFR 25.119(f) because delay in consummation of the transaction is related to internal corporate matters only, and the ultimate consummation reflects a transaction reviewed and approved by the Commission. Applicant also requests waiver of the 30-day consummation notification requirement because applicant in good faith relied upon the ULS electronic system and believed that indicators that the application had not been accepted reflected prior system errors that had been addressed during the initial filing of the Form 312.

We regret any inconvenience these oversights may have caused. Please contact me if you have any questions regarding this matter.

Sincerely

  
David Cosson

Attachments