



PUBLIC NOTICE

Federal Communications Commission
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Report No. SPB-263

DA 15-653
June 1, 2015

**PLEADING CYCLE ESTABLISHED FOR APPLICATIONS FILED BY LIGHTSQUARED
SUBSIDIARY LLC, DEBTOR-IN-POSSESSION, AND LIGHTSQUARED SUBSIDIARY, LLC,
FOR FCC CONSENT TO ASSIGN LICENSES AND OTHER AUTHORIZATIONS AND
REQUEST FOR DECLARATORY RULING ON FOREIGN OWNERSHIP**

IB Docket No. 15-126

Comments/Petitions Due: July 1, 2015

Responses to Comments/Oppositions to Petitions Due: July 13, 2015

Replies to Responses/Oppositions Due: July 20, 2015

I. INTRODUCTION

On April 6, 2015, LightSquared Subsidiary LLC, Debtor-in-Possession (“LightSquared Sub DIP”) and LightSquared Subsidiary, LLC (“LightSquared Sub”) (collectively, the “Applicants”) filed a series of applications under sections 214 and 310(d) of the Communications Act of 1934, as amended (the “Act”).¹ The Applicants request Commission approval to assign the licenses and other authorizations held by LightSquared Sub DIP to a reorganized entity, LightSquared Sub, pursuant to a plan of reorganization under Chapter 11 of the Bankruptcy Code.² The proposed transaction, if completed, would shift control of the Commission authorizations from Harbinger Capital Partners Funds (“Harbinger”)³ to JPMorgan Chase & Co. (“JPMorgan”), Fortress Investment Group LLC (“Fortress”), and Jeffrey Aronson and Mark Gallogly, through Centerbridge Partners, L.P. (“Centerbridge”). The Applicants also request a declaratory ruling to permit LightSquared Sub to exceed the 25 percent benchmark for foreign ownership in section 310(b)(4) of the Act.⁴ In addition, on May 28, 2015, One Dot Six Corp. filed an application for

¹ See 47 U.S.C. §§ 214, 310(d); *Applications for Consent to Assign Licenses and Authorizations from LightSquared Subsidiary LLC, Debtor-in-Possession, to Reorganized LightSquared Subsidiary, LLC* (filed Apr. 6, 2015) (“Application”). Page citations to the Application refer to the public interest statement submitted in the assignment applications filed under section 310(d) of the Act. See, e.g., IBFS File No. SAT-ASG-20150406-00017.

² See 11 U.S.C. §§ 101 *et seq.*

³ See *SkyTerra Communications, Inc., Transferor, and Harbinger Capital Partners Funds, Transferee, Applications for Consent to Transfer of Control of SkyTerra Subsidiary, LLC*, IB Docket No. 08-184, Memorandum Opinion and Order and Declaratory Ruling, 24 FCC Rcd 3059 (IB, OET, and WTB 2010) (*Harbinger Transfer Order*).

⁴ See 47 U.S.C. § 310(b)(4); *LightSquared Subsidiary, LLC; Petition for Declaratory Ruling Under Section 310(b)(4) of the Communications Act of 1934* (filed Apr. 6, 2015, and refiled May 22, 2015) (“Petition”). Page citations to the Petition refer to the Petition for Declaratory Ruling filed May 22, 2015.

Commission approval of a *de facto* transfer spectrum leasing arrangement in connection with the proposed transaction.

II. DESCRIPTION OF THE PROPOSED REORGANIZATION

The proposed reorganization will result in Harbinger relinquishing control of the Commission authorizations currently held by LightSquared Sub DIP.⁵ LightSquared Sub DIP is a provider of mobile-satellite service (“MSS”). It uses geostationary-satellite networks operating in L-band frequencies⁶ to deliver voice and data services to mobile devices throughout North America. LightSquared Sub DIP is licensed by the Commission to operate the SkyTerra-1 and MSAT-2 space stations,⁷ fixed and mobile earth stations, and terrestrial communications facilities. It also holds domestic section 214 authority and international section 214 authorizations. Harbinger will also relinquish control of One Dot Six Corp., Debtor-in-Possession,⁸ the lessee under a *de facto* transfer leasing arrangement in connection with a nationwide license issued to OP LLC for terrestrial operations in the 1670-1675 MHz frequency band.

Since May 2012, the LightSquared entities have operated as debtors-in-possession under Chapter 11 of the Bankruptcy Code.⁹ On March 27, 2015, the bankruptcy court confirmed a plan of reorganization that would allow the LightSquared debtor entities to emerge from bankruptcy under new ownership.¹⁰

According to the Application, the assignee of the Commission authorizations, LightSquared Sub, will be a wholly owned direct subsidiary of the reconstituted LightSquared LP, “New LightSquared,” a Delaware limited liability company.¹¹ New LightSquared will also acquire all of the interests in One Dot Six Corp.¹² All of the common units and most of the equity in New LightSquared will be held by JPMorgan, Fortress, Centerbridge, Harbinger, or their affiliates.¹³ The Applicants state that JPMorgan, a

⁵ LightSquared Sub DIP is a wholly owned direct subsidiary of LightSquared LP, Debtor-in-Possession, which in turn is a wholly owned indirect subsidiary of LightSquared Inc., Debtor-in-Possession. See Application at 3, Attach. B. LightSquared Inc., Debtor-in-Possession, is controlled by Harbinger. See *Harbinger Transfer Order*, 24 FCC Rcd 3059; Letter from Jeffrey J. Carlisle, Executive Vice President, Regulatory Affairs and Public Policy, LightSquared GP Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, IBFS File No. SES-T/C-20080822-01088 (filed July 20, 2010) (noting corporate name changes from SkyTerra to LightSquared).

⁶ The “L-band” is a general designation for frequencies from 1 to 2 GHz. In the United States, the Commission has allocated L-band spectrum for MSS downlinks (space-to-Earth transmissions) in the 1525-1544 MHz and 1545-1559 MHz bands and for MSS uplinks (Earth-to-space transmissions) in the 1626.5-1645.5 MHz and 1646.5-1660.5 MHz bands. See 47 C.F.R. § 2.106.

⁷ LightSquared Sub DIP also holds conditional authorization to deploy an ancillary terrestrial component of its MSS satellite networks.

⁸ One Dot Six Corp., Debtor-in-Possession, is a wholly owned subsidiary of LightSquared Inc., Debtor-in-Possession. See Application, Attach. B.

⁹ See *In re LightSquared Inc., et al.*, Case No. 12-12080 (Bankr. S.D.N.Y.).

¹⁰ See Application at 3, Attach. D.

¹¹ *Id.* at 5.

¹² *Id.* at 4.

¹³ See *id.* at 6, 8-12; Letter from Gerard J. Waldron, Counsel, LightSquared Subsidiary LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, IBFS File No. SAT-ASG-20150406-00017, at 8, Attach. 3 (filed May 22, 2015) (Supplement). These investors will own equity in New LightSquared through both common and preferred unit holdings.

publicly held company, is expected to hold its interests through a wholly owned indirect subsidiary, described as the “Reorganized LightSquared Inc.” (“RLI”).¹⁴ RLI will hold, indirectly, approximately 21.25% of the New LightSquared Common Units,¹⁵ and will have the right to appoint one member of the seven-member New LightSquared governing board.¹⁶ Fortress, a publicly traded company,¹⁷ ultimately controls LSQ Acquisition Co LLC (“LSQ”),¹⁸ which will hold approximately 26.2% of the New LightSquared Common Units¹⁹ and the right to appoint two members of the New LightSquared Board.²⁰ Jeffrey Aronson and Mark Gallogly, through Centerbridge,²¹ will control the right to appoint one member of the New LightSquared Board.²² The other three positions on the New LightSquared Board will be filled by the Chief Executive Officer of New LightSquared and two Board members elected by the Board members appointed by Centerbridge, Fortress (through LSQ), and JPMorgan (through RLI).²³ Messrs. Aronson and Gallogly also ultimately control two Centerbridge affiliates, CCP II AIV II, L.P. and Centerbridge Capital Partners SBS II, L.P., which together will hold approximately 8.1% of the New LightSquared Common Units.²⁴ Finally, Harbinger, through HGW US Holding Company, L.P. (“HGW

¹⁴ See Application at 8. The Applicants state that no individual or entity holds a 10% or greater voting or equity interest in JPMorgan. *Id.* In a supplement to the Application filed May 22, 2015, the Applicants note that JPMorgan is considering an alternative corporate structure through which to hold its interests in New LightSquared. See Supplement at 2-3. The Applicants state that pursuing the alternative structure, under which RLI would be converted from a corporation to a limited liability company and subsequently merged into a wholly owned subsidiary of JPMorgan, would have no effect on the ultimate ownership and control of RLI (or its successor entity) or on JPMorgan’s interest in New LightSquared. See *id.*

¹⁵ Application at 8. RLI will also indirectly hold 53.6% of the New LightSquared Series A-1 Preferred Units, 14.23% of the Series A-2 Preferred Units, 31.42% of the Series B Preferred Units, and 25.63% of the Series C Preferred Units. *Id.*; see also *id.* at 7-8 nn.12-13 (noting the assumptions used to calculate percentages of preferred unit holdings), Attach. D at 19-20 (defining New LightSquared Common and Preferred interests). Depending on the value ascribed to the various classes of interests, these common and preferred unit holdings will equate to equity interests in New LightSquared ranging between 21.25% and 40.91%. *Id.* at 8.

¹⁶ *Id.* at 7, Attach. D at 61. Membership of the New LightSquared Board will be governed by the operating agreement of New LightSquared. See *id.*, Attach. D at 60-61 (describing the composition of the New LightSquared Board under the New LightSquared Interest Holders Agreement). According to the Applicants, the New LightSquared Board will exercise the power to appoint the members of the Board of Managers of LightSquared Sub. *Id.* at 6.

¹⁷ Fortress has two classes of shares. Class A shares, representing approximately 48% of the Fortress interests, are publicly traded. Class B shares, representing the remaining 52% of the equity in Fortress, are held by four U.S. citizens: Wesley Edens, Randal Nardone, Peter L. Briger, Jr., and Michael Novogratz. *Id.* at 9.

¹⁸ The Applicants state that LSQ will be controlled by a non-member manager, Fortress Credit Advisors LLC, which in turn is ultimately controlled by Fortress. See *id.* at 9.

¹⁹ *Id.* at 8-9. LSQ will also hold 14.23% of the New LightSquared Series A-2 Preferred Units and 52.41% of the Series B Preferred Units. *Id.* In addition, the Application states that another entity ultimately controlled by Fortress, CF LSQ C Holdings LLC, will hold 43.53% of the New LightSquared Series C Preferred Units. *Id.* at 9 n.15. Depending on the value ascribed to the various classes of interests, these Fortress holdings together will equate to equity interests in New LightSquared ranging between 16.29% and 26.2%. See Supplement at 2.

²⁰ See Application at 7, Attach. D at 61.

²¹ The Applicants state that Messrs. Aronson and Gallogly, U.S. citizens, each holds 50% of the voting interests in Centerbridge and together control the company. See Supplement at 3.

²² *Id.*; Application at 7, Attach. D at 61.

²³ See Application at 7, Attach. D at 61.

US”),²⁵ will hold approximately 44.45% of the New LightSquared Common Units.²⁶ Harbinger’s interest, however, will not entitle it to appoint any members of the New LightSquared Board.²⁷

The Applicants assert that the proposed transaction will further the public interest and will not create competitive harms. They argue that grant of the Application will allow LightSquared entities to emerge from bankruptcy and that, with significant new investment and other assets, New LightSquared will be better equipped to provide existing and new services to the public.²⁸ At the same time, the Applicants assert that the proposed transaction will not adversely affect actual or potential market concentration or otherwise harm consumers.²⁹

LightSquared Sub states that it and its direct and indirect parent companies commit to comply with the national security, law enforcement, and public safety commitments made in the Agreement by and among LightSquared Sub’s predecessor and its parent companies, the U.S. Department of Justice, and the Federal Bureau of Investigation, dated November 14, 2001.³⁰

III. ASSIGNMENT APPLICATIONS

The file numbers and call signs of the LightSquared Sub DIP facilities that are the subject of the assignment applications are listed below. In addition, the Applicants request that any Commission approval of the assignment applications include any authorizations that may have been inadvertently omitted.³¹ The Applicants also request that any such approval include appropriate authority for reorganized LightSquared entities to acquire control of: (1) any authorizations issued to LightSquared Inc. or its subsidiaries while the assignment applications are pending before the Commission and during the period required for consummation of the transaction; (2) any construction permits held by LightSquared Inc. or its subsidiaries that mature into licenses after closing; (3) any applications or lease notifications filed by LightSquared Inc. or its subsidiaries that are pending at the time of consummation; and (4) any leases of spectrum into which LightSquared Inc. or its subsidiaries enter into as lessees while the

(Continued from previous page) _____

²⁴ See *id.* at 10; Supplement at 3. CCP II AIV II, L.P. and Centerbridge Capital Partners SBS II, L.P. together will also directly hold 14.2% of the New LightSquared Series A-2 Preferred Units, 16.2% of the Series B Preferred Units, and 0.3% of the Series C Preferred Units. See Application at 10; Supplement at 3. Depending on the value ascribed to the various classes of interests, these common and preferred unit holdings will equate to equity interests in New LightSquared ranging between 3.2% and 8.1%. See Application at 10; Supplement at 3.

²⁵ See Application at 10-12. The Applicants state that Philip A. Falcone, a U.S. citizen, ultimately controls HGW US as well as four of the five Harbinger funds that indirectly hold an approximately 99.8% equity interest in HGW US, and the general partner of the fifth fund, which is in the process of liquidation. See *id.* at 10-11.

²⁶ *Id.* at 10-12. HGW US will also directly hold 46.4% of the New LightSquared Series A-1 Preferred Units and 0.59% of the Series C Preferred Units. *Id.* at 10. Depending on the value ascribed to the various classes of interests, the HGW US holdings will equate to equity interests in New LightSquared ranging between 26.64% and 44.45%. *Id.*

²⁷ *Id.* at 7. In addition, the Applicants assert that Harbinger’s interest will not entitle it to exercise voting power over New LightSquared other than with respect to certain extraordinary matters. *Id.*

²⁸ *Id.* at 14-16.

²⁹ *Id.* at 16-17; see also Supplement at 7.

³⁰ Petition at 27 n.45.

³¹ Application at 18-19.

assignment applications are pending and during the period required for consummation.³² To the extent necessary, the Applicants request a blanket exemption from any applicable cut-off rules.³³

IV. SECTION 310(d) APPLICATIONS

A. Part 25 – Satellite Communications Licenses

The following applications for consent to the assignment of space station and earth station licenses from LightSquared Sub DIP to LightSquared Sub have been assigned the file numbers listed below:

Satellite Space Station Licenses

<u>File No.</u>	<u>Licensee</u>	<u>Call Sign</u>
SAT-ASG-20150406-00017	LightSquared Subsidiary LLC, Debtor-in-Possession	S2358
SAT-ASG-20150409-00021	LightSquared Subsidiary LLC, Debtor-in-Possession	AMSC-1

Satellite Earth Station Licenses – Fixed

<u>File No.</u>	<u>Licensee</u>	<u>Call Sign</u>
SES-ASG-20150406-00192	LightSquared Subsidiary LLC, Debtor-in-Possession	E080030 E080031 E100051 E130161 E930124

Satellite Earth Station Licenses – Mobile

<u>File No.</u>	<u>Licensee</u>	<u>Call Sign</u>
SES-ASG-20150406-00191	LightSquared Subsidiary LLC, Debtor-in-Possession	E930367 E980179

B. Parts 90 and 101 – Private Wireless Licenses

The following application for consent to the assignment of private wireless licenses from LightSquared Sub DIP to LightSquared Sub has been assigned the file number listed below:

<u>File No.</u>	<u>Licensee</u>	<u>Call Sign</u>
0006726911	LightSquared Subsidiary LLC, Debtor-in-Possession	WQHL596 WQMN726

³² See *id.* at 18.

³³ *Id.* at 19.

C. Part 27 – Misc. Wireless Services *De Facto* Transfer Lease

The following application for a long-term *de facto* transfer spectrum leasing arrangement between One Dot Six Corp. and OP LLC has been assigned the file number listed below:³⁴

<u>File No.</u>	<u>Lessee</u>	<u>Lease ID Number</u>
0006817249	One Dot Six Corp.	L000016369

D. Part 5 – Experimental Radio Service License

The following application for consent to the assignment of an experimental license from LightSquared Sub DIP to LightSquared Sub has been assigned the file number listed below:

<u>File No.</u>	<u>Licensee</u>	<u>Call Sign</u>
0004-EX-AU-2015	LightSquared Subsidiary LLC, Debtor-in-Possession	WH2XDX

V. SECTION 214 AUTHORIZATIONS

A. Part 63 – Domestic Section 214 Authority

The Applicants have filed an application for consent to the transfer of control of domestic section 214 authority from LightSquared Sub DIP to LightSquared Sub. LightSquared Sub DIP holds domestic section 214 authority to provide interstate telecommunications services throughout the United States.

B. Part 63 – International Section 214 Authorizations

The following application for consent to the assignment of international section 214 authorizations from LightSquared Sub DIP to LightSquared Sub has been assigned the file number listed below:

<u>File No.</u>	<u>Authorization Holder</u>	<u>Authorization Number</u>
ITC-ASG-20150406-00084	LightSquared Subsidiary LLC, Debtor-in-Possession	ITC-214-19951215-00023 ITC-MOD-20120927-00246

VI. PETITION FOR DECLARATORY RULING UNDER SECTION 310(b)(4)

LightSquared Sub (or “Petitioner”) has filed a petition for declaratory ruling (“Petition”), pursuant to section 310(b)(4) of the Act and section 1.990(a)(1) of the Commission’s rules,³⁵ requesting that the Commission issue a declaratory ruling permitting foreign ownership of its controlling U.S.-organized parent, New LightSquared, in excess of the 25 percent benchmark in section 310(b)(4). Petitioner states that, upon consummation of the proposed transaction, entities deemed to be foreign

³⁴ Under the Wireless Telecommunications Bureau’s standard filing practice, this application was submitted as a new *de facto* transfer lease application but is intended to reflect the assignment of the existing lease authority from One Dot Six Corp., Debtor-in-Possession, to the reorganized One Dot Six Corp.

³⁵ 47 C.F.R. § 1.990(a)(1).

would hold an aggregate indirect equity interest in New LightSquared of between approximately 40% and 70%.³⁶

Pursuant to section 1.991(i) of the rules,³⁷ LightSquared Sub requests that the Commission specifically approve foreign equity and voting interests that would be held directly or indirectly in New LightSquared as specified below. According to the Petition, the foreign-organized entities listed below would hold their indirect interests in New LightSquared through HGW US, a Delaware limited partnership that would hold between 26.64% and 44.45% of New LightSquared's total equity. Petitioner states that HGW US is controlled by Philip A. Falcone, a U.S. citizen. For purposes of calculating New LightSquared's foreign voting interests under section 1.991 of the rules, Petitioner has treated HGW US as if it were an unincorporated member of New LightSquared that is deemed to hold a 100% voting interest:

HGW Holding Company, L.P. (100% voting and 26.61-44.41% equity interest)
HGW GP, Ltd. (100% voting and less than 0.1% equity interest)
Harbinger Capital Partners Master Fund I, Ltd. (70.1% voting and 18.66-31.33% equity interest)
Harbinger Class PE Holdings (Cayman), Ltd. (16.73% voting and 4.46-7.44% equity interest)
Harbinger Capital Partners Intermediate Fund I, Ltd. (70.1% voting and 9.49-15.84% equity interest)
Harbinger Capital Partners Offshore Fund I, Ltd. (70.1% voting and 8.01-13.36% equity interest)
Alford Investment Strategies Ltd. (29.62% voting and 4.49-8.94% equity interest)
Abu Dhabi Investment Council (29.62% voting and 4.49-8.94% equity interest)
Harbinger Capital Partners Special Situations Offshore Fund, L.P. (16.02% voting and 4.27-7.12% equity interest)

The Petition also requests advance approval for the foregoing entities to increase their interests up to and including a non-controlling 49.99% equity and/or voting interest in New LightSquared. Advance approval is also requested for these entities to increase their interests up to and including a 100% direct or indirect equity and/or voting interest in HGW US.³⁸

Petitioner asserts that the proposed level of indirect foreign ownership will serve the public interest by providing the capital necessary to allow the LightSquared entities to emerge from bankruptcy, consistent with the broad aims of the Bankruptcy Code, the Act and the Commission's rules and policies.³⁹

The Petition has been assigned the following IBFS file number:

<u>File No.</u>	<u>Petitioner:</u>
ISP-PDR-20150406-00002	LightSquared Subsidiary, LLC

VII. EX PARTE STATUS OF THIS PROCEEDING

This proceeding shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.⁴⁰ Persons making *ex parte* presentations must file a copy of any written

³⁶ Petition at 8.

³⁷ 47 C.F.R. § 1.991(i).

³⁸ Petition at 23.

³⁹ *Id.* at 24-25.

⁴⁰ 47 C.F.R. §§ 1.1200 *et seq.*

presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (*e.g.*, .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

VIII. GENERAL INFORMATION

The applications and Petition referred to in this Public Notice have been found, upon initial review, to be acceptable for filing. The Commission reserves the right to return any application if, upon further examination, it is determined to be defective and not in conformance with the Commission's rules or policies. Although the Applicants request streamlined treatment for the Application and Petition under various sections of the Commission's rules,⁴¹ in light of the multiple applications pending before the Commission with respect to this transaction and the public interest review associated with them, the Application and Petition are not subject to streamlined treatment.⁴²

Interested parties must file comments or petitions to deny the applications no later than **July 1, 2015**. Persons and entities that timely file comments or petitions to deny may participate fully in the proceeding. Responses to comments or oppositions to petitions must be filed no later than **July 13, 2015**. Replies to responses or oppositions must be filed no later than **July 20, 2015**. All filings concerning matters referenced in this Public Notice should refer to **DA 15-653** and **IB Docket No. 15-126**, as well as the specific file numbers of the individual applications or other matters to which the filings pertain.

Under the Commission's procedures for the submission of filings and other documents, submissions in this matter may be filed electronically (*i.e.*, through ECFS) or by hand delivery.

- **Electronic Filers:** Comments may be filed using the Commission's Electronic Comment Filing System (ECFS) at <http://fjallfoss.fcc.gov/ecfs2/>. See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).
- **Paper Filers:** Parties who choose to file by paper must file an original and one copy of each filing. Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by

⁴¹ 47 C.F.R. §§ 63.03(b)(2)(i), 63.12.

⁴² See 47 C.F.R. §§ 63.03(c)(1), 63.12(c)(3). See also *Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licenses under Section 310(b)(4) of the Communications Act, as Amended*, IB Docket No. 11-133, Second Report and Order, 28 FCC Rcd 5741, 6809-10, ¶ 132 (2013).

first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th St., SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington, DC 20554.

In addition, one copy of each submission must be sent to the following:

- 1) Clay DeCell, Satellite Division, International Bureau, at Clay.DeCell@fcc.gov or (202) 418-0748 (facsimile);
- 2) Marilyn Simon, Satellite Division, International Bureau, at Marilyn.Simon@fcc.gov or (202) 418-0748 (facsimile);
- 3) David Krech, Policy Division, International Bureau, at David.Krech@fcc.gov or (202) 418-2824 (facsimile);
- 4) Susan O'Connell, Policy Division, International Bureau, at Susan.OConnell@fcc.gov or (202) 418-2824 (facsimile);
- 5) Jeffrey Tobias, Mobility Division, Wireless Telecommunications Bureau, at Jeff.Tobias@fcc.gov or (202) 418-7447 (facsimile);
- 6) Dennis Johnson, Competition Policy Division, Wireline Competition Bureau, at Dennis.Johnson@fcc.gov or (202) 418-0809 (facsimile);
- 7) Behnam Ghaffari, Electromagnetic Compatibility Division, Office of Engineering and Technology, at Behnam.Ghaffari@fcc.gov or (202) 418-1918 (facsimile);
- 8) Neil Dellar, Office of General Counsel, at Neil.Dellar@fcc.gov or (202) 418-1234 (facsimile); and
- 9) The Commission's duplicating contractor, Best Copy and Printing, Inc., 445 12th St., SW, Room CY-B402, Washington, DC 20554, www.bcpweb.com; (202) 488-5563 (facsimile).

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to FCC504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY).

For further information, contact Clay DeCell, Satellite Division, International Bureau, at (202) 418-0803.

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