

LAW OFFICES
GOLDBERG, GODLES, WIENER & WRIGHT
1229 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036

HENRY GOLDBERG
JOSEPH A. GODLES
JONATHAN WIENER
HENRIETTA WRIGHT
DANIEL S. GOLDBERG
W. KENNETH FERREE

EX PART OR LATE FILED

(202) 429-4900
TELECOPIER:
(202) 429-4912

e-mail:
general@g2w2.com

1. **Some History**

Section 9(b) of the Communications Act 47 U.S.C. § 159(b) requires the

[REDACTED]

among all payors rather than assessed against one group of licensees.

- User Information Services: Minimal for GSO satellite services.
- International: Although some of the Commission's international activities are on behalf of current GSO satellite operations, much, if not most, of it relates to new satellite services and, indeed, to other non-satellite services.

3. The Proposed Fees Are Disproportionate To Those Paid By Other Communications Services.

accounting data associated with international activities had to be "adjusted" because the system was used "for only a small portion of FY 1996." See Attachment D, footnote. There is no discussion of how this "adjustment" was made.

Because of the opacity of the cost figures used by the Commission, it is impossible to analyze the figures meaningfully. However, the sheer size of the costs attributed to GSO space stations in relation to the actual degree of Commission oversight of these systems suggests strongly that the allocation has been skewed. For instance, the Commission's cost accounting system may not