

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter Of

MARITIME COMMUNICATIONS/LAND MOBILE, LLC

EB Docket No. 11-71

Participant in Auction No. 61 and Licensee of
Various Authorizations in the Wireless Radio Services

File No. EB-09-IH-1751
FRN: 0013587779

Applicant for Modification of Various
Authorizations in the Wireless Radio
Services

Application File Nos.
0004030479, 0004144435,
0004193028, 0004193328,
0004354053, 0004309872,
0004310060, 0004314903,
0004315013, 0004430505,
0004417199, 0004419431,
0004422320, 0004422329,
0004507921, 0004153701,
0004526264, 0004636537,
and 0004604962.

Applicant with ENCANA OIL AND GAS (USA), INC.;
DUQUESNE LIGHT COMPANY;
DCP MIDSTREAM, LP;
JACKSON COUNTY RURAL MEMBERSHIP
ELECTRIC COOPERATIVE;
PUGET SOUND ENERGY, INC.;
ENBRIDGE ENERGY COMPANY, INC.;
INTERSTATE POWER AND LIGHT COMPANY;
WISCONSIN POWER AND LIGHT COMPANY;
DIXIE ELECTRIC MEMBERSHIP CORP., INC.;
ATLAS PIPELINE—MID CONTINENT, LLC;
DENTON COUNTY ELECTRIC COOPERATIVE,
INC., d/b/a COSERV ELECTRIC; and
SOUTHERN CALIFORNIA REGIONAL RAIL
AUTHORITY

To: Marlene H. Dortch, Secretary
Attention: Chief Administrative Law Judge Richard L. Sippel

**ENL-VSL MOTION FOR LEAVE TO FILE
OPPOSITION TO BUREAU MOTION TO STRIKE**

Environmental LLC (ENL) and Verde Systems LLC (VSL), together ENL-VSL, hereby request leave to file an Opposition to the Enforcement Bureau (“Bureau”) motion to strike the ENL-VSL Proposed Findings of Fact on Issue (g) filed on April 15, 2015 (the “Motion”), in the event that the Presiding Judge does not dismiss the Motion as moot.

The Motion requests that the Presiding Judge strike the ENL-VSL Proposed Findings of Fact, or in the alternative establish a schedule for reply pleadings. Motion, page 6 (“In the alternative the Bureau requests that the Presiding Judge establish a schedule pursuant to which the parties may file reply findings of fact.”) Subsequently, the Presiding Judge established a schedule for reply findings in FCC 15M-13, note 1 (“The Conclusions of Law on Issue G, as well as Replies to Proposed Findings of Fact and Conclusions of Law, shall be scheduled after the hearing on the remaining issues.”). Since the alternative relief requested was granted, ENL-VSL respectfully request that the Motion be dismissed as moot.

In the event that the Motion is not dismissed as moot in view of the grant of the alternative requested relief, ENL-VSL respectfully request leave to file an Opposition to the Motion, and an extension of one business day after such determination to file the Opposition. The Opposition currently is due on April 24, 2015.

On April 22, 2015, the Presiding Judge issued Order FCC 15M-14 which disqualifies and excludes ENL and VSL from further participation in this proceeding under Section 1.243(f). ENL-VSL and their counsel, the undersigned, are mindful of this Order and do not wish to make any filings in disregard of Order FCC 15M-14.

It is possible that the reference to further proceedings in FCC 15M-14 was intended to refer to the hearing on the remaining issues and not to preclude ENL-VSL from responding to a pending motion on Issue G filed before FCC 15M-14, including if the Presiding Judge intends to consider the ENL-VSL proposed findings of fact. Nevertheless, ENL-VSL believe that a request for leave to file an Opposition is required under the Order in FCC 15M-14 and accordingly are filing this request for leave.

Wherefore, for the foregoing reasons, ENL-VSL respectfully request the Motion be dismissed as moot in view of the grant of alternative relief in setting a schedule for the Bureau to reply, and in the event the Motion is not dismissed, that ENL-VSL be granted leave to file an Opposition and an extension of three business days after the ruling to file the Opposition or as much time as the Presiding Judge determines is appropriate.

Respectfully submitted,

 /s/
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April 23, 2015

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has on this 23th day of April, 2015, arranged to be mailed by first class United States mail copies of the foregoing Motion for Leave to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
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Washington, DC 20554

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