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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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IN THE MATTERS OF)	
)	
NORCOM COMMUNICATIONS CORPORATION)	
ASS'N FOR EAST END LAND MOBILE COVERAGE)	
LMR 900 ASSOCIATION OF SUFFOLK)	WTB DOCKET No. 98-181
METRO NY LMR ASSOCIATION)	
NY LMR ASSOCIATION)	
WIRELESS COMM. ASSOCIATION OF SUFFOLK COUNTY)	

TO: HON. ADMINISTRATIVE LAW JUDGE JOHN M. FRYSIK

**EXPEDITED MOTION TO EXTEND NORCOM'S RESPONSE PERIOD
FOR BUREAU'S REQUEST FOR ADMISSIONS; MOTION TO ESTABLISH DEADLINE FOR
SERVICE OF REQUEST FOR ADMISSIONS**

Norcom Communications Corp. ("Norcom"), by its attorneys and pursuant to section 1.246(b) of the rules and regulations of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. § 1.246(b) (1997), hereby moves the Presiding Judge to extend the 10-day time period by which Norcom is permitted to respond to the Request For Admissions ("Request"), filed by the Wireless Telecommunications Bureau ("Bureau") on December 3, 1998. As set forth more fully below, grant of this Motion is in the public interest.

Norcom's response to the Request is due no later than December 16, 1998. Thus, Norcom seeks an expedited ruling on this Motion. Norcom is simultaneously submitting herewith a Motion to Delete and/or Change Issues ("Motion to Delete") in this proceeding. Norcom's Motion to Delete raises key -- and possibly dispositive -- issues in this proceeding:

- 1) The failure of the Commission's October 14, 1998, Hearing Designation Order ("HDO") to specify the correct legal standard for determining whether Norcom unlawfully assumed control of the stations licensed to the above-referenced associations ("Associations") without

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FCC approval; and 2) The FCC's specific acquiescence to the very licensing arrangements to which it now objects. Norcom believes that its Motion to Delete will materially affect the nature of this proceeding and that the FCC may wish to amend its Request upon the disposition of the Motion to Delete. Similarly, pursuant to Section 1.246(a) and for the reasons heretofore stated, Norcom requests that the deadline for its service of Requests for Admission be established as ten (10) days after the Presiding Judge rules on the Motion to Delete.¹

¹ Norcom is also waiting to receive the Commission's response to Norcom's request for inspection of records pursuant to the Freedom of Information Act ("FOIA"). The deadline for providing that response, originally November 24, 1998, was extended by the FCC and is now December 10, 1998. Norcom expects that its receipt of material responsive to its FOIA request will necessitate requests for authentication and/or admissions from the agency.

WHEREFORE, THE PREMISES CONSIDERED, Norcom requests that the Presiding Judge 1) suspend the time period by which Norcom is required to respond to the Request until ten (10) days after the Presiding Judge issues an order disposing of the Motion to Delete submitted simultaneously herewith; and 2) establish the deadline by which Norcom must serve the FCC with requests for admission as ten (10) days from the time that such an order is issued.

Respectfully submitted,

NORCOM COMMUNICATIONS CORPORATION

By: *Russell H. Fox*

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Dated: December 9, 1998

CERTIFICATE OF SERVICE

I, Donna Fleming, a secretary in the law firm of Gardner, Carton & Douglas, certify that I have this 9th day of December, 1998, caused to be sent by facsimile and overnight delivery, a copy of the foregoing Motion to the following:

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