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December 9, 1998

HAND DELIVERED

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1919 M Street, N.W., Room 222
Washington, D.C. 20554

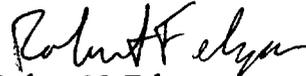
Re: WTB Docket No. 98-181

Dear Ms. Salas:

Transmitted herewith, on behalf of the Association for East End Land Mobile Coverage, LMR 900 Association of Suffolk, Metro NY LMR Association, NY LMR Association, and Wireless Communications Association of Suffolk County (the "Associations"), is an original and 6 copies of the Associations' Consolidated Motion to Extend the Associations' Response Period for Bureau's Request for Admissions; Consolidated Motion to Establish Deadline for Service of Request for Admissions to be filed in the above-referenced docket.

Should further information be necessary, please contact the undersigned.

Yours very truly,



Robert N. Felgar
Counsel for
Association for East End Land Mobile Coverage
LMR 900 Association of Suffolk
Metro NY LMR Association
NY LMR Association
Wireless Communications Association of Suffolk County

RNF:deb

Enclosures

cc: The Honorable John M. Frysiak
Judy Lancaster, Esq.
Russell H. Fox, Esq.

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ORIGINAL

Before the
Federal Communications Commission,
Washington DC 20554

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. Fysiak

**CONSOLIDATED MOTION TO EXTEND THE ASSOCIATIONS'
RESPONSE PERIOD FOR BUREAU'S REQUEST FOR
ADMISSIONS; CONSOLIDATED MOTION TO ESTABLISH DEADLINE
FOR SERVICE OF REQUEST FOR ADMISSIONS**

The Association for East End Land Mobile Coverage, LMR 900 Association of Suffolk, Metro NY LMR Association, MY LMR Association, and Wireless Communications Association of Suffolk County ("Associations"), by their attorney 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 move the Presiding Judge to extend the 10-day time period by which the Associations' are 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.

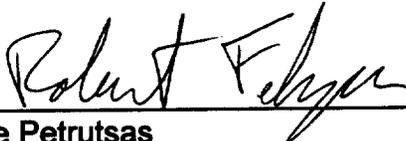
The Associations' response to the Request is now due no later than December 16, 1998. Thus, the Associations seek an expedited ruling on this Motion. The Associations are simultaneously submitting herewith a Consolidated Motion to Delete and/or Change Issues ("Consolidated Motion to Delete") in this proceeding. The Associations' Consolidated Motion to Delete raises a key - and possibly dispositive - issue in this proceeding, namely the failure of the Commission's October 14, 1998, Hearing Designation Order ("HDO") to specify the correct legal standard for determining whether the Associations unlawfully transferred control of its stations to Norcom Communications Corporation without FCC approval. The Associations believe that their Consolidated 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 Consolidated Motion to Delete. Similarly, pursuant to Section 1.246(a) and for the reasons heretofore stated, the Associations request that the deadline for its service of Requests for Admission be established as ten (10) days after the Presiding Judge rules on the Consolidated Motion to Delete.

WHEREFORE, THE PREMISES CONSIDERED, the Associations request that the Presiding Judge (1) suspend the time period by which the Associations are required to respond to the Request until ten (10) days after the Presiding Judge issues an order disposing of the Consolidated Motion to Delete submitted simultaneously herewith; and

(2) establish the deadline by which the Associations must serve the FCC with requests for admission to ten (10) days from the time that such an order is issued.

Respectfully submitted,

ASSOCIATION FOR EAST END LAND
MOBILE COVERAGE
LMR 900 ASSOCIATION OF SUFFOLK
METRO NY LMR ASSOCIATION
NY LMR ASSOCIATION
WIRELESS COMM. ASSOCIATION OF
SUFFOLK COUNTY

By  _____

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SUFFOLK COUNTY

December 9, 1998

Certificate of Service

I, Deborah N. Lunt, a secretary with the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 9th day of December, 1998, I caused copies of the foregoing "Consolidated Expedited Motion to Extend the Associations' Response Period for Bureau's Request for Admissions; Motion to Establish Deadline for Service of Request for Admissions" to be delivered by facsimile and first-class mail, postage prepaid, to the following:

Judy Lancaster*
Wireless Telecommunications Bureau
Federal Communications Commission
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Deborah N. Lunt

*By Hand Delivery