

ANN BAVENDER\*  
ANNE GOODWIN CRUMP  
VINCENT J. CURTIS, JR.  
PAUL J. FELDMAN  
RICHARD HILDRETH  
FRANK R. JAZZO  
ANDREW S. KERSTING  
EUGENE M. LAWSON, JR.  
SUSAN A. MARSHALL\*  
HARRY C. MARTIN  
GEORGE PETRUTSAS  
RAYMOND J. QUIANZON  
LEONARD R. RAISH  
JAMES P. RILEY  
ALISON J. SHAPIRO  
KATHLEEN VICTORY  
JENNIFER DINE WAGNER\*  
HOWARD M. WEISS

\* NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ARLINGTON, VIRGINIA 22209-3801

(703) 812-0400

TELECOPIER

(703) 812-0486

INTERNET

www.fhh-telcomlaw.com

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

FRANK U. FLETCHER  
(1939-1985)  
ROBERT L. HEALD  
(1956-1983)  
PAUL D. P. SPEARMAN  
(1936-1962)  
FRANK ROBERSON  
(1936-1961)  
RUSSELL ROWELL  
(1948-1977)  
EDWARD F. KENEHAN  
(1960-1978)

CONSULTANT FOR INTERNATIONAL AND  
INTERGOVERNMENTAL AFFAIRS  
SHELDON J. KRYS  
U. S. AMBASSADOR (ret.)

OF COUNSEL  
EDWARD A. CAINE\*  
MITCHELL LAZARUS\*  
EDWARD S. O'NEILL\*  
JOHN JOSEPH SMITH

WRITER'S DIRECT  
(703) 812-0480

[raish@fhh-telcomlaw.com](mailto:raish@fhh-telcomlaw.com)

September 21, 2000

**VIA HAND DELIVERY**

Magalie Roman Salas, Esquire  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Room TW-B204  
Washington, D.C. 20554

Re: WT Docket No. 00-48  
RM-9499

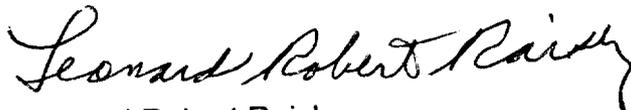
Dear Ms. Salas:

We are filing an original and five (5) copies of its Reply Comments in the above-referenced matter.

If there are questions, do not hesitate to call the undersigned at (703) 812-0480.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, PLC



Leonard Robert Raish

LRR:cej  
Enclosures

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BEFORE THE  
**Federal Communications Commission**

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Parts 13 and 80 of the ) WT Docket No. 00-48  
Commission's Rules concerning )  
Maritime Communications )  
)  
Petition for Rule Making Filed by ) RM-9499  
Globe Wireless, Inc. )  
)  
Federal Communications Bar Association's )  
Petition for Forbearance from Section 310(d) )  
of the Communications Act Regarding Non- )  
Substantial Assignments of Wireless Licenses )  
and Transfers of Control involving )  
Telecommunications Carriers )  
)  
and )  
)  
Personal Communications Industry Association's )  
Broadband Personal Communications Services )  
Alliance's Petition for Forbearance for Broadband )  
Personal Communications Services )

**REPLY COMMENTS OF**  
**LEONARD ROBERT RAISH**  
**ATTORNEY-AT-LAW**

The purpose of this Reply Comment is to suggest a process for the successful completion of the work proposed in this proceeding. The Commission faces an enormous task in amending and otherwise bringing up to date Parts 13 and 80 of its Rules. On the order of 190 pages of Rules are involved. Those Rules are generally very technical in nature and must be responsive to the operational needs of the maritime industry.

Noting the foregoing, it is suggested the Commission initiate a "negotiated rulemaking" to cope with the task of what amounts to a major rewrite of Part 80. The "negotiated

rulemaking” would be chaired by Commission personnel with assistance of a team made up of Government and industry personnel familiar with maritime telecommunications. The team would be charged with drafting a new Part 80 for the Commission’s consideration taking into account WT Docket No. 00-48, RM-9499, and all Comments and Reply Comments filed in this proceeding. A significant work effort will be involved but it is believed the Commission will end up with an excellent new Part 80 as a result.

The Commission is urged to give favorable consideration to the use of a “negotiated rulemaking” as suggested herein above.

Respectfully submitted,

  
LEONARD ROBERT RAISH

Fletcher, Heald & Hildreth, PLC  
1300 North 17<sup>th</sup> Street - 11<sup>th</sup> Floor  
Arlington, Virginia 22209  
(703) 812-0400

Date: September 21, 2000