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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Parts 2 and 25 of the )  
Commission's Rules to Permit Operation )  
of NGSO FSS Systems Co-Frequency with )  
GSO and Terrestrial Systems in the Ku-Band; )  
)  
Amendment of the Commission's Rules to )  
Authorize Subsidiary Terrestrial Use of the )  
12.2-12.7 GHz Band by Direct Broadcast Satellite )  
Licensees and Their Affiliates )  
)  
Applications of Broadwave, USA, )  
PDC Broadband Corporation, and )  
Satellite Receivers, Ltd. to Provide )  
A Fixed Service in the 12.2-12.7 GHz Band )

ET Docket No. 98-206 /  
RM-9147  
RM-9245

To: The Commission

**REQUEST FOR WAIVER**

SkyBridge L.L.C. ("SkyBridge"), by its attorneys, hereby requests the Commission to waive, pursuant to Section 1.3 of its rules, its page limit for petitions for reconsideration, 47 C.F.R. § 1.429(d), with respect to the Commission's First Report and Order and Further Notice of Proposed Rule Making in the above-captioned matter.<sup>1/</sup>

The First Report & Order establishes allocations for two very different services, the non-geostationary satellite orbit ("NGSO") Fixed-Satellite Service ("FSS") and the newly-created Multichannel Video Distribution and Data Service ("MVDDS"). In addition, the First Report & Order adopts extensive and detailed rules for NGSO FSS, to govern sharing between this service and a variety of other services, including geostationary satellite orbit ("GSO") FSS

<sup>1/</sup> FCC 00-418, released December 8, 2000.

systems, GSO Broadcasting-Satellite Service ("BSS") systems, Fixed-Service ("FS") and other terrestrial point-to-point systems, and the Radiolocation, Space Science, and Radioastronomy services. As noted by the Commission, the actions taken in the First Report & Order are extremely complex, requiring detailed technical and policy analysis.

SkyBridge is one the parties that stands to be most directly affected by the decisions taken in the First Report & Order. While SkyBridge has tried to be as succinct as possible in its Petition for Reconsideration, it simply cannot address all of the myriad and diverse topics raised in the First Report & Order that warrant reconsideration within the page limit.

For these reasons, SkyBridge requests the Commission to waive its page limit in this instance, and accept the totality of the SkyBridge Petition for Reconsideration, filed simultaneously herewith.

Respectfully submitted,

SKYBRIDGE L.L.C.

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March 19, 2001