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November 22, 2002

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VIA COURIER

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: *In re Global Crossing Ltd.*, Application for Transfer of Control
and Petition for Declaratory Ruling, IB Docket No. 02-286;
Opposition to ACN Request for Extension of Time**

Dear Secretary Dortch:

Global Crossing Ltd. (Debtor-in-Possession) and GC Acquisition Limited ("Applicants"), by their undersigned counsel, hereby oppose the request of American Communications Network, Inc. ("ACN") for an extension of time to file reply comments in the above-referenced proceeding. Replies were due November 18, 2002.

ACN has failed to demonstrate the need for an extension of time. ACN asserts that it requires an extension because purported technical problems with the Commission's Electronic Comment Filing System ("ECFS") prevented ACN from obtaining all of the submissions filed in this proceeding. Regardless of whether ACN is correct about the availability of the ECFS, all of the submissions were available in the Commission's Public Reference Room. ACN's counsel, who is located in Washington, D.C., could easily have obtained the documents from the Public Reference Room. Their failure to do so does not provide grounds for an extension of time.

ACN also maintains that it needs an extension in order to review any filings made after November 5, 2002. Only the Applicants and ACN made ~~substantive~~ filings on November 5, and to Applicants' knowledge no substantive filings were made after that date.¹ ACN does not require time to respond to filings that were never made.

¹ Several individuals filed comments on or after November 5 that merely repeat the baseless allegations of earlier individual commenters.

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Marlene H. Dortch, Secretary

November 22, 2002

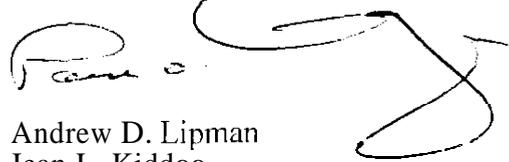
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Finally, ACN has failed to comply with the Commission's procedures for filing a motion for an extension of time pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46. Specifically, ACN failed to make its request in a timely manner and failed to serve or notify Applicants that ACN was seeking an extension of time. *See* 47 C.F.R. § 1.46(b)-(c).

As ACN itself noted, it is not the Commission's policy to routinely grant extensions of time. ACN fails to give a valid reason to depart from the Commission's general policy. Therefore, Applicants respectfully request that the Commission deny ACN's request.

Enclosed for filing are an original and four copies of this opposition. Please date-stamp the enclosed extra copy and return it with the courier.

Respectfully submitted,



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Counsel for Global Crossing Ltd. and GC
Acquisition Limited

cc: See attached Certificate of Service

CERTIFICATE OF SERVICE

1. Ruth W. Moroz, hereby certify that on this 22nd day of November 2002, I caused a true and correct copy of the foregoing Opposition to ACN Request for Extension of Time to be served upon the following parties in the manner indicated:

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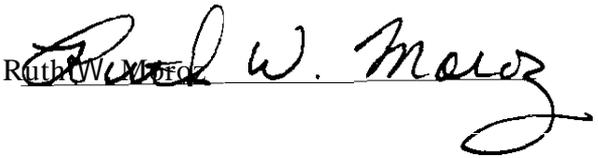
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