

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Commercial Spectrum	)	WT Docket No. 05-211
Enhancement Act and Modernization of the	)	
Commission's Competitive Bidding Rules and	)	
Procedures	)	
	)	
Auction of Advanced Wireless Services Licenses	)	AU Docket No. 06-30
Scheduled for August 9, 2006 (rev. FCC 06-71)	)	

To: The Commission

**MOTION FOR LEAVE TO SUPPLEMENT MOTION FOR EXPEDITED STAY**

The Minority Media and Telecommunications Council, Council Tree Communications, Inc., and Bethel Native Corporation (together referred to hereinafter as the "Joint Petitioners") hereby move that the Commission grant the Joint Petitioners leave to file a Further Supplement to Motion for Expedited Stay ("Further Supplement") concerning the Commission's *Second Report and Order and Second Further Notice of Proposed Rule Making* (FCC 06-52) adopted and released in WT Docket 05-211 on April 25, 2006 ("*Second Report and Order*").

The Commission does not typically consider additional pleadings outside the pleading cycle of a motion for stay. *See* 47 C.F.R. § 1.45(d). The matters at issue in this proceeding are very substantial, however, implicating multiple statutory requirements and relating to an important and much anticipated spectrum auction. Moreover, circumstances have changed materially since Joint Petitioners' last filing on May 17, 2006 with the Commission's announcement that Auction 66 will be postponed until August 9, 2006. *See* Further Supplement at 1-2. It is critical for the Commission to have as complete a record as possible, and the

additional information provided in the contemporaneously filed Further Supplement should assist the Commission by providing current information in the wake of the May 19 postponement of Auction 66. Joint Petitioners respectfully submit that the public interest therefore will be served by the Commission's acceptance of the Further Supplement to the record in this proceeding.

Respectfully submitted,

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May 25, 2006

## CERTIFICATE OF SERVICE

I, Rebecca J. Cunningham, a secretary to the law firm Leventhal Senter & Lerman PLLC, hereby certify that a true and correct copy of the foregoing “Motion for Leave to Supplement Motion for Expedited Stay” was sent this 25<sup>th</sup> day of May, 2006 to each of the following via the methods identified:

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/s/ Rebecca J. Cunningham  
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