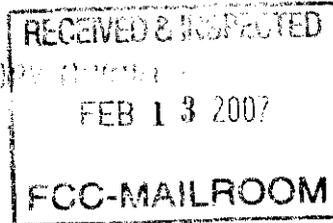


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**Jack Richards**  
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January 10, 2007

**EX PARTE PRESENTATION**

Mr. John J. Schauble  
Deputy Chief  
Broadband Division  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

ORIGINAL

Re: WT Docket No. 02-68 et al.  
American Petroleum Institute  
SUPPLEMENT TO PETITION FOR RECONSIDERATION

Dear Mr. Schauble:

The American Petroleum Institute ("API"), by its attorneys, pursuant to Section 1.1206 of the Commission's Rules, respectfully submits this letter supplementing its Petition for Reconsideration ("Petition") filed in the above-captioned proceeding.

In its Petition and several subsequent submissions and presentations, API stressed the urgent need in the Gulf of Mexico for access to the communications capabilities presented by the Broadband Radio Service ("BRS"). As API demonstrated, the 2.5 GHz band will be used in the Gulf of Mexico to compensate for a lack of available spectrum between 900 MHz and 6 GHz -- particularly spectrum suitable for critical broadband applications. Use of the band will advance recent initiatives to convert to IP-enabled broadband networks, which, in turn, will promote safe and efficient oil and natural gas exploration, production and transportation in this critical area. The need for access to the BRS in the Gulf of Mexico is unquestionable.

In addition, API's Petition requested that the Commission establish the boundaries of the Gulf of Mexico BRS service area at the shoreline at high mean tide, as opposed to 12 nautical miles from the shoreline as advocated by some parties in this proceeding. Although establishing the border of the Gulf Service Area at 12 nautical miles from the shoreline will exclude a portion of the oil and natural gas industry's offshore infrastructure, it is clear from discussions among API's members that the overriding concern is the ability to move forward with the use of the 2.5 GHz band as quickly as possible. With that goal in mind, API no longer opposes establishing the boundary of the Gulf Service Area at 12 nautical miles from the shoreline to the extent that doing so will allow the Commission to move towards the greater objective of licensing the 2.5 GHz band in the Gulf.

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Mr. John J. Schauble

January 10, 2007

Page 2

Should you have any questions or require any additional information, please feel free to contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Jack Richards". The signature is written in a cursive style with a large, looping initial "J".

Wayne V. Black

Jack Richards

Greg Kunkle

cc: Attached Service List

Attachments

## CERTIFICATE OF SERVICE

I, Cheryl L. Thornhill, a secretary at the law firm of Keller and Heckman, LLP, do hereby certify that on this 10th day of January, 2007, a copy of the foregoing Supplement to Petition for Reconsideration of the American Petroleum Institute has been served via first class mail on the following:

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/s/Cheryl L. Thornhill  
Cheryl L. Thornhill