

Commission's rules, which specify that

Memoranda must contain a summary of the substance of the *ex parte* presentation and not merely a listing of the subjects discussed. More than a one or two sentence description of the views and arguments presented is generally required.

Petitioners showed, and Applicants do not - and cannot - deny that their two *ex parte* notices fell far short of this explicit requirement. While the Applicants assert that they "simply reiterated the merits of the Transfer Applications and the critical need for prompt action," there is nothing in the pleadings of this case specifying the need for action by any particular time, and this aspect of the presentations reiterated nothing previously on the record.

Thus, the Applicants have failed to respond, much less to provide convincing reason not to grant Petitioners' motion.

WHEREFORE, Petitioners ask that the Commission suspend processing of the pending Applications until the Applicants come into full compliance with the Commission's rules and afford Petitioners and other parties one week within which to meet with Commission staff to respond and rebut such arguments as were made in the Applicants' presentations to the Commission staff, and afford all such other relief as may be just and proper.

Respectfully submitted,

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Certificate of Service

I, Andrew Jay Schwartzman, hereby certify that on this 19th day of November, 2007 a copy of the foregoing *Reply to Joint Opposition to Emergency Motion to Suspend Processing of Applications* was served by first-class mail, postage prepaid, upon the following:

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