

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

MARITIME COMMUNICATIONS/LAND)
MOBILE, LLC)

EB Docket No. 11-71
File No. EB-09-IH-1751
FRN: 0013587779

Participant in Auction No. 61 and Licensee of)
Various Authorizations in the Wireless Radio)
Services)

Application File Nos. 0004030479,
0004144435, 0004193028,
0004193328, 0004354053,
0004309872, 0004310060,
0004314903, 0004315013,
0004430505, 0004417199,
0004419431, 0004422320,
0004422329, 0004507921,
0004153701, 0004526264,
0004636537, and 0004604962

Applicant with ENCANA OIL AND GAS (USA),)
INC.; DUQUESNE LIGHT COMPANY; DCP)
MIDSTREAM, LP; JACKSON COUNTY)
RURAL MEMBERSHIP ELECTRIC)
COOPERATIVE; PUGET SOUND ENERGY,)
INC.; ENBRIDGE ENERGY COMPANY, INC.;)
INTERSTATE POWER AND LIGHT)
COMPANY; WISCONSIN POWER AND)
LIGHT COMPANY; DIXIE ELECTRIC)
MEMBERSHIP CORPORATION, INC.;)
ATLAS PIPELINE – MID CONTINENT, LLC)
DENTON COUNTY ELECTRIC)
COOPERATIVE, INC., DBA COSERV)
ELECTRIC; AND SOUTHERN CALIFORNIA)
REGIONAL RAIL AUTHORITY)

For Commission Consent to the Assignment of)
Various Authorizations in the Wireless Radio)
Services)

To: Marlene H. Dortch, Secretary
Attention: Chief Administrative Law Judge Richard L. Sippel

FILED/ACCEPTED
AUG 19 2011
Federal Communications Commission
Office of the Secretary

**MOTION FOR LEAVE TO FILE RESPONSE TO MARITIME'S REPLY TO OPPOSITIONS TO
MOTION TO DEFER**

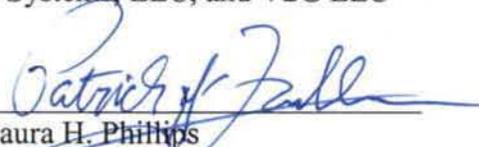
On August 16, 2011, Maritime Communications/Land Mobile, LLC ("Maritime")
submitted a Reply to Oppositions to Motion to Defer all Procedural Dates submitted by in the
above-captioned proceeding. As the Maritime Reply correctly notes, the Commission's hearing

No. of Copies rec'd 046
List ABCDE

rules do not provide for replies in interlocutory matters, nor do they provide for responses to any reply that is submitted.¹ Warren C. Havens, Environmental, LLC, Intelligent Transportation and Monitoring Wireless, LLC, Skybridge Spectrum Foundation, Telesaurus Holdings GB, LLC, Verde Systems, LLC, and V2G LLC (collectively, "SkyTel"), by their attorneys, hereby respectfully request leave to file a brief response to the Maritime Reply.

Respectfully Submitted,

Warren C. Havens, Environmental, LLC,
Intelligent Transportation and Monitoring
Wireless, LLC, Skybridge Spectrum
Foundation, Telesaurus Holdings GB, LLC,
Verde Systems, LLC, and V2G LLC

By: 

Laura H. Phillips
Howard M. Liberman
Patrick R. McFadden
Drinker Biddle & Reath LLP
1500 K Street, N.W., Suite 1100
Washington, DC 20005-1209
Laura.Phillips@dbr.com
Howard.Liberman@dbr.com
Patrick.McFadden@dbr.com
202-842-8800
202-842-8465/66 (fax)

Their Attorneys

August 19, 2011

¹ Reply to Oppositions to Motion to Defer Procedural Dates, EB Docket No. 11-71, 2, citing 47 C.F.R. § 1.294(b) (Aug. 16, 2011) ("Maritime Reply").

CERTIFICATE OF SERVICE

I, Patrick R. McFadden, hereby certify that on this 19th day of August, 2011, a true copy of this Motion was served via first class, postage paid United States Mail upon the following:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Robert J. Keller
Law Offices of Robert J. Keller, P.C.
P.O. Box 33428
Washington, DC 20033

Robert J. Miller, Esquire
Gardere Wynne Sewell LLP
1601 Elm Street, Suite 3000
Dallas, TX 75201

Robert M. Gurss, Esquire
Paul J. Feldman, Esquire
Harry F. Cole, Esquire
Christine Goepp, Esquire
Fletcher, Heald & Hildreth, P.L.C.
1300 N Street, 11th Floor
Arlington, VA 22209

Kurt E. Desoto, Esquire
Joshua S. Turner
Wiley Rein LLP
1776 K Street, N.W.
Washington, DC 20006

Dennis C. Brown
8124 Cooke Court, Suite 201
Manassas, VA 20109

Pamela A. Kane, Deputy Chief
Investigations and Hearing Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 4-C330
Washington, DC 20554

Albert J. Catalano, Esquire
Matthew J. Plache, Esquire
Catalano & Plache, PLLC
3221 M Street, N.W.
Washington, DC 20007

Charles A. Zdebski, Esquire
Eric J. Schwalb, Esquire
Eckert Seamans Cherin & Mellott, LLC
1717 Pennsylvania Avenue, N.W.
Washington, DC 20006

Jeffrey L. Sheldon, Esquire
Fish & Richardson, P.C.
1425 K Street, N.W.
11th Floor
Washington, DC 20005

Sandra DePriest
Maritime Communications/Land Mobile LLC
218 North Lee Street
Suite 318
Alexandria, Virginia 22314


Patrick R. McFadden