

Before the
Federal Communications Commission
Washington, D.C. 20554

FILED/ACCEPTED

SEP 16 2011

Federal Communications Commission
Office of the Secretary

In re)
)
MARITIME COMMUNICATIONS/LAND)
MOBILE, LLC)
)
Participant in Auction No. 61 and Licensee of)
Various Authorizations in the Wireless Radio)
Services)
)
Applicant for Modification of Various)
Authorizations in the Wireless Radio Services)
)
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)

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

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

To: Marlene H. Dortch, Secretary

Attention: Chief Administrative Law Judge Richard L. Sippel

**ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE SUPPLEMENT TO ITS
OPPOSITION TO MOTION TO DEFER ALL PROCEDURAL DATES**

1. On August 10, 2011, the Enforcement Bureau ("Bureau") opposed a motion by Maritime Communications/Land Mobile, LLC ("Maritime") to stay the instant proceeding to allow the company to pursue bankruptcy-related relief under the Commission's *Second Thursday*

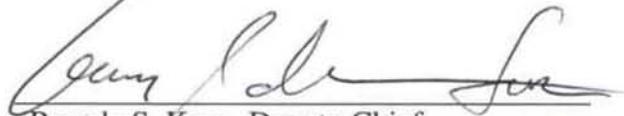
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policy.¹ Therein, the Bureau pointed to a number of representations in Maritime's stay request that threw up red flags strongly indicating that a stay at this time was premature. Since that time, the Bureau has received new information relating to Maritime's bankruptcy petition which, in the Bureau's view, further demonstrates why a stay of this proceeding at this time is inappropriate and ill-advised. The Bureau believes it is in the public interest for the Presiding Judge to have this additional information as he considers Maritime's motion. Accordingly, the Bureau hereby respectfully requests leave to file the supplement to its opposition filed concurrently with this Motion.

2. For the foregoing reasons, the Bureau respectfully asks the Presiding Judge to grant the Bureau's motion for leave to file a supplement to its opposition to Maritime's Motion to Defer All Procedural Dates.

Respectfully submitted,

P. Michele Ellison
Chief, Enforcement Bureau



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September 16, 2011

¹ See Maritime's Motion to Defer All Procedural Dates, filed August 1, 2011 ("Motion") and Enforcement Bureau's Opposition to Motion to Defer All Procedural Dates, filed August 10, 2011.

CERTIFICATE OF SERVICE

Makia Day, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 16th day of September, 2011, sent by first class United States mail copies of the foregoing "ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE SUPPLEMENT TO ITS OPPOSITION TO MOTION TO DEFER ALL PROCEDURAL DATES" to:

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