

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

In the Matter of)	
)	
MARITIME COMMUNICATIONS/LAND)	EB Docket No. 11-71
MOBILE, LLC)	File No. EB-09-IH-1751
)	FRN: 0013587779
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.;)	Application File Nos.
DUQUESNE LIGHT COMPANY; DCP)	0004030479, 0004144435,
MIDSTREAM, LP; JACKSON COUNTY RURAL)	0004193028, 0004193328,
MEMBERSHIP ELECTRIC COOPERATIVE; PUGET)	0004354053, 0004309872,
SOUND ENERGY, INC.; ENBRIDGE ENERGY)	0004310060, 0004314903,
COMPANY, INC.; INTERSTATE POWER AND)	0004315013, 0004430505,
LIGHT COMPANY; WISCONSIN POWER AND)	0004417199, 0004419431,
LIGHT COMPANY; DIXIE ELECTRIC)	0004422320, 0004422329,
MEMBERSHIP CORPORATION, INC.; ATLAS)	0004507921, 0004153701,
PIPELINE—MID CONTINENT, LLC; DENTON)	0004526264, 0004636537,
COUNTY ELECTRIC COOPERATIVE, INC., DBA)	and 0004604962
COSERV ELECTRIC; AND SOUTHERN)	
CALIFORNIA REGIONAL RAIL AUTHORITY)	
)	
For Commission Consent to the Assignment of Various)	
Authorizations in the Wireless Radio Services)	

**MOTION FOR LEAVE TO HAVE MARITIME’S BANKRUPTCY
COUNSEL APPEAR AT PREHEARING CONFERENCE VIA TELEPHONE**

Maritime Communications/Land Mobile, LLC (“Maritime”) hereby respectfully requests leave for its bankruptcy counsel, Mr. Craig Geno, to appear at the March 10, 2012, prehearing conference via telephone. The order setting the conference states that one of the matters to be discussed is the status of the bankruptcy proceedings. Order (FCC 12M-12; rel. Mar. 7, 2012). Mr. Geno’s input will obviously be helpful, but his schedule and the expense involved preclude his ability to appear in person. Maritime will bear the costs involved in this arrangement.

WHEREFORE, it is submitted that the public interest will be served by permitting Mr. Geno to participate via telephone, and Maritime requests leave for him to do so.

Respectfully Submitted,



Robert J. Keller
Counsel for Maritime Communications/
Land Mobile, LLC

Email: rjk@telcomlaw.com
Telephone: 202.656.8490
Facsimile: 202.223.2121

Law Offices of Robert J. Keller, P.C.
PO Box 33428
Washington, D.C. 20033

Dated: March 8, 2012

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of March, 2012, I caused copies of the foregoing pleading to be served, by U.S. Postal Service, First Class postage prepaid, on the following:

Pamela A. Kane, Deputy Chief
Brian Carter, Esquire
Investigations and Hearing Division
Enforcement Bureau
Federal Communications Commission
445 Twelfth Street NW – Room 4-C330
Washington DC 20554

Jack Richards, Esquire
Wesley K. Wright, Esquire
Keller and Heckman LLP
1001 G Street NW– Suite 500 West
Washington DC 20001

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

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

Warren C. Havens
& SkyTel Companies
2509 Stuart Street
Berkeley CA 94705

Howard Liberman, Esquire
Patrick McFadden, Esquire
DrinkerBiddle
1500 K Street NW– Suite 1100
Washington DC 20005-1209

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

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

Jeffrey L. Sheldon, Esquire
Fish & Richardson, P.C.
1425 K Street NW –Eleventh Floor
Washington, D.C. 20005

Paul J. Feldman, Esquire
Harry F. Cole, Esquire
Christine Goepf, Esquire
Fletcher, Heald & Hildreth, P.L.C.
1300 N Street – Eleventh Floor
Arlington, Virginia 22209



Robert J. Keller
Counsel for Maritime
Communications/Land Mobile, LLC