

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-III-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)

FILED/ACCEPTED

MAR - 8 2012

Federal Communications Commission
Office of the Secretary

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

Request to Permit Bankruptcy Counsel and Other Counsel to
Appear at Status Conference by Telephone

The undersigned "SkyTel" entities submit the following: By Order released March 7, 2012 (FCC 12M-12), the Presiding Judge scheduled a Status Conference at the Commission at 10 AM on March 12, 2012 in the captioned proceeding. The SkyTel entities are parties in this proceeding. SkyTel has legal counsel identified below located in Mississippi (MS) and Northern

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New Jersey (NJ) represent SkyTel in legal proceedings, noted below, relevant to this FCC proceeding. However, due to scheduling conflicts said counsel cannot come to Washington DC to attend the March 12 status conference in person. Thus, the undersigned respectfully requests permission to allow them to attend and participate in in this status conference via conference telephone, as was arranged for the January prehearing conference in this proceeding (where a call-in number was provided to a conference phone in the hearing room).¹ The SkyTel MS Counsel is the firm of Copleland Cooke, including attorneys Danny Ruhl and Bill Lecch. The SkyTel NJ Counsel is the firm Winne Banta, including attorney Tendai Richards.

SkyTel filed today in this proceeding a request similar to the instant request today, to allow the undersigned to attend by telephone. The undersigned notes that its MS and NJ counsel identified above are not and will not be SkyTel counsel in this FCC proceeding (they are not FCC law experts, are in locations remote to Washington DC, and are not suitable). However their participation in the subject status conference will be relevant to this proceeding. In brief:

Said MS counsel is SkyTel counsel in the Maritime bankruptcy which is based on Maritime's desired "Second Thursday" relief it has often stated in this proceeding (and said relief is part of Maritime's plan for its bankruptcy stated to the bankruptcy court). The bankruptcy is further noted below.

Said NJ counsel is SkyTel counsel in its Sherman Act 1 claim against Maritime (and co-conspirators as plead in the operative Complaint): that claim was subject to the Maritime bankruptcy "automatic stay," but the court granted the SkyTel motion to lift the stay this week, and said claim will proceed against Maritime in the US District Court, New Jersey and if

¹ While the SkyTel entities have mostly completed research, screening and selection of replacement legal counsel for this hearing (and, as required, for other cases including before the FCC), that will not be completed by March 12, 2012.

adjudicated in favor of SkyTel plaintiffs, may result in (i) an order of the court revoking Maritime licenses under 47 U.S.C. §313, and/ or (ii) SkyTel being a major, or the major, creditor in the Maritime bankruptcy and with voting power in chapter 11 “reorganization” plans or other action by Maritime in its bankruptcy that involves creditor voting or challenges.

In addition, discovery in the three cases (this FCC proceeding, the Maritime bankruptcy proceeding, and the just noted Sherman Act 1 proceeding in a USDC NJ) is to some degree interrelated. All three proceedings involve Maritime, FCC licenses in the name of Maritime, validity or invalidity of the licenses, Maritime violations of law including FCC law in relation to the licenses, and claims of SkyTel to said licenses and against Maritime.

Respectfully Submitted, March 8, 2012

Warren C. Havens, Environmental, LLC, Intelligent Transportation and Monitoring Wireless, LLC, Skybridge Spectrum Foundation, Telesaurus Holdings GB, LLC, and Verde Systems, LLC, and V2G LLC (together, “SkyTel”),

By: 

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CERTIFICATE OF SERVICE

The undersigned hereby certify that on this 8th day of March 2012, a true copy of the preceding filing was served via first class, postage paid United States Mail upon the following:

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/s/

Warren Havens, Jimmy Stobaugh