

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

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

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

Attn: The Honorable Richard L. Sippel, Chief Administrative Law Judge

**MOTION FOR LEAVE TO SUBMIT A
REPLY TO ENFORCEMENT BUREAU'S OBJECTION
TO MARITIME'S FIRST DRAFT GLOSSARY**

Maritime Communications/Land Mobile, LLC (Maritime), hereby respectfully requests
leave, to the extent necessary, to submit a reply—being tendered concurrently herewith—to the
Enforcement Bureau's Objection to Maritime's First Draft Glossary. The Presiding Judge's
Order (FCC 12M-39; rel. Aug. 7, 2012), pursuant to which the draft glossary and the

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Enforcement Bureau's objection were filed, did not specifically provide for a reply, and so Maritime is requesting leave to the extent it may be needed. The public interest and the efficiency of the conduct of this case will be served by ensuring that the Presiding Judge is sufficiently briefed on the various terms and phrases as well as their unique meaning in the realm of AMTS regulation. Moreover, insofar as many of the terms are unavoidable mixed matters of both law and fact, it is important that the applicable legal and regulatory underpinnings be fully properly enunciated and explained.

WHEREFORE, it is respectfully submitted that Maritime has demonstrated good cause for allowing a reply in this matter.

Respectfully Submitted,

A handwritten signature in black ink that reads "Robert J. Keller". The signature is written in a cursive style with a checkmark-like flourish at the beginning.

Robert J. Keller, Counsel for Maritime
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Dated: August 28, 2012

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August, 2012, I caused copies of the foregoing pleading to be served, by U.S. Postal Service, First Class postage prepaid, on the following:

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