

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

In re)	
)	
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)	
)	
Applicant for Modification 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)	

To: Marlene H. Dortch, Secretary

Attention: Chief Administrative Law Judge Richard L. Sippel

ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE RESPONSE

1. On January 23, 2013, Choctaw Telecommunications, LLC and Choctaw Holdings, LLC (Choctaw) filed a Petition to Stay all of the issues designated in the above-captioned hearing, including Issue (g), pending resolution of its request for *Second Thursday* relief.¹ On January 29, 2013, the Enforcement Bureau (Bureau) filed an Opposition in which it

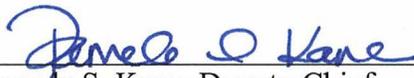
¹ See Petition to Stay, filed January 23, 2013 (Petition).

correctly pointed out that the Presiding Judge has already considered and resolved this exact question.² On January 30, 2013, Choctaw replied to the Bureau's Opposition by filing a "Motion To Correct The Record."³

2. The Bureau believes it is in the public interest for the Presiding Judge to have an accurate record as he considers whether to grant Choctaw's Petition. The Bureau respectfully requests that the Presiding Judge grant the Bureau's instant motion for leave to file a Response to Choctaw's motion. In its Response, being filed concurrently herewith, the Bureau demonstrates that Choctaw's motion offers no basis for the Presiding Judge to reverse his ruling on allowing Issue (g) to proceed.

3. For the foregoing reasons, the Bureau respectfully asks the Presiding Judge to grant the Bureau's motion for leave to file a response to Choctaw's pleading.

Respectfully submitted,
P. Michele Ellison
Chief, Enforcement Bureau


Pamela S. Kane, Deputy Chief
Investigations and Hearings Division
Enforcement Bureau

Brian J. Carter
Attorney
Investigations and Hearings Division
Enforcement Bureau

Federal Communications Commission
445 12th Street SW, Room 4-C330
Washington, D.C. 20554
(202) 418-1420
January 31, 2013

² See Enforcement Bureau's Opposition to Choctaw's Petition to Stay, filed January 29, 2013 (Opposition).

³ See Choctaw's Motion To Correct the Record, filed on January 30, 2013.

CERTIFICATE OF SERVICE

Makia Day, an Enforcement Analyst in the Enforcement Bureau’s Investigations and Hearings Division, certifies that she has on this 31st day of January, 2013, sent by first class United States mail copies of the foregoing “ENFORCEMENT BUREAU’S MOTION FOR LEAVE TO FILE RESPONSE” to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

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

Dennis C. Brown
8124 Cooke Court
Suite 201
Manassas, VA 20109
Counsel for Maritime Communications/Land Mobile LLC

Jeffrey L. Sheldon
Levine, Blaszak, Block & Boothby, LLP
2001 L Street, NW, Suite 900
Washington, DC 20036
Counsel for Puget Sound Energy, Inc

Jack Richards
Wesley Wright
Keller & Heckman LLP
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
Counsel for Atlas Pipeline – Mid Continent LLC; DCP Midstream, LP; Enbridge Energy Co., Inc.; EnCana Oil and Gas (USA), Inc.; and Jackson County Rural Membership Electric Cooperative

Charles A. Zdebski
Gerit F. Hull
Eckert Seamans Cherin & Mellott, LLC
1717 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
Counsel for Duquesne Light Co.

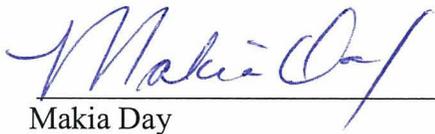
Paul J. Feldman
Harry F. Cole
Fletcher, Heald & Hildreth, P.L.C.
1300 N. 17th Street – 11th Floor
Arlington, VA 22209
Counsel for Southern California Regional Rail Authority

Matthew J. Plache
Albert J. Catalano
Catalano & Plache, PLLC
3221 M Street, N.W.
Washington, D.C. 20007
Counsel for Dixie Electric Membership Corp.
Counsel for Pinnacle Wireless Corp.

Robert J. Keller
Law Offices of Robert J. Keller, P.C.
P.O. Box 33428
Washington, D.C. 20033
Counsel for Maritime Communications/Land Mobile LLC

James Ming Chen
2904 Beaumont Road
Louisville, KY 40205
Counsel for Warren Havens and SkyTel

Robert G. Kirk
Wilkinson Barker Knauer, LLP
2300 N Street, NW Suite 700
Washington, DC 20037
Counsel for Choctaw Telecommunications, LLC and Choctaw Holdings, LLC


Makia Day