

**C L I F F O R D  
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August 31, 2001

AUG 31 2001

Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
TW -A325  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: File No. SES-ASG-20010504-00896  
Opposition to Motion for Waiver to Accept Pleading

Dear Ms. Salas:

On behalf of Telenor Satellite Mobile Services, Inc. and Telenor Satellite, Inc. ("Telenor") and COMSAT Corporation and COMSAT General Corporation ("COMSAT"), please find enclosed herewith an original and four copies of their Opposition to the Motion for Waiver to Accept Pleading filed by Litigation Recovery Trust.

With the attached Certificate of Service, Telenor and COMSAT certify that all parties entitled to receive a copy of the enclosed pleading have been so served.

Questions concerning COMSAT should be directed to Rosemary Harold of Wiley Rein & Fielding, 1776 K Street, N.W., Washington, D.C. 20006, telephone (202) 719-7000. You may direct questions concerning Telenor to George Kleinfeld of Clifford Chance Rogers & Wells, 2001 K Street, N.W., Washington, D.C. 20006, telephone (202) 912-5000.

Respectfully submitted,



Damon A. Terrill  
Counsel for Telenor

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

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AUG 31 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Lockheed Martin Global )  
Telecommunications, COMSAT )  
Corporation, and COMSAT )  
General Corporation, Assignor )  
)  
and )  
)  
Telenor Satellite Mobile Services, Inc., )  
and Telenor Satellite, Inc., Assignee )  
)  
Applications for Assignment of )  
Section 214 Authorizations and )  
Earth Station Licenses )

File No. SES-ASG-20010504-00896

**OPPOSITION TO MOTION FOR WAIVER TO ACCEPT PLEADING**

COMSAT Corporation, COMSAT General Corporation, Lockheed Martin Global Telecommunications, Telenor Satellite Mobile Services, Inc., and Telenor Satellite, Inc. (collectively, the "Applicants") hereby file their Opposition to the Motion For Waiver to Accept Pleading filed by Litigation Recovery Trust ("LRT") in the above-captioned proceeding.<sup>1</sup> LRT has requested that the Commission accept a "Supplement" to its Petition to Deny, notwithstanding that the pleading cycle in this proceeding has closed. Because LRT has failed to show good cause why the Commission should waive its rules to permit the untimely Supplement's entry into the record, the Commission should deny LRT's Motion and disregard the Supplement.

<sup>1</sup> *In the Matter of Lockheed Martin Global Telecommunications, et al., Applications for Assignment of Section 214 Authorizations and Earth Station Licenses, File No. SES-ASG-20010504-00896, Motion For Waiver to Accept Pleading of Litigation Recovery Trust (filed Aug. 31, 2001) ("Motion").*

Despite claims that the Supplement contains "critical evidence" and identifies "special circumstances" that might justify waiver of the Commission's rules, LRT bases its Motion entirely on an article from the *Wall Street Journal* that has no relevance whatsoever to this proceeding. Applicants have reviewed the article in question and find no connection between its subject matter (the recent fall in the value of Deutsche Telekom shares) and the instant applications.

LRT has participated fully in this proceeding, but the period for filing pleadings has now closed. Indeed, LRT observes correctly that waiver of the Commission's rules is appropriate "only if special circumstances warrant a deviation from the general rule."<sup>2</sup> The publication of a newspaper article concerning matters wholly unrelated to the applications under review does not create "special circumstances," by any definition.

For the reasons stated herein, the Commission should deny LRT's Motion and disregard their "Supplement."

Respectfully submitted,



George Kleinfeld  
Damon A. Terrill  
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2001 K Street, N.W.  
Washington, D.C. 20006

*Counsel for Telenor Satellite Mobile  
Services, Inc. and Telenor Satellite Inc.*

August 31, 2001



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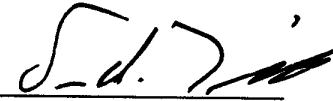
*Counsel for Lockheed Martin Global  
Communications and COMSAT  
Corporation*

<sup>2</sup> Motion at ¶ 8.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing Opposition was served on this date via Federal Express or U.S. mail, postage prepaid, to:

Mr. William L. Whitely  
Trustee  
Litigation Recovery Trust  
515 Madison Avenue  
Suite 2400  
New York, NY 10022



Damon A. Terrill

August 31, 2001