

LOCKHEED MARTIN 

February 20, 1998

Lester M. Bridgeman, Esq.  
Miller, Hamilton, Snider & Odom, LLC  
254 State Street  
Mobile, Alabama 36603

Re: HeavyLift Volga Dnepr Charter Flight - Philadelphia-  
Moffett Field, California - Telesat Payload

Dear Mr. Bridgeman:

This letter is submitted in support of our need for the services of a HeavyLift Volga Dnepr AN124-100 aircraft to transport one Telesat satellite payload, in container, from Philadelphia, Pennsylvania to Moffett Field, California on February 28, 1998. The Telesat payload, in container, is 28' long, 9.5" wide, and 11.5" high. It is too large to transport in any U.S. carrier aircraft.

For the reasons set out below, we are operating on an extremely tight schedule. We are now behind schedule. The delay is attributable in substantial part to the fact that this is the first payload to come out of our new Newtown, Pennsylvania Lockheed Payload Center which will replace our present New Jersey plant. The "bugs" normally associated with coordinating facilities and activities in a new plant have contributed substantially to the need for air transportation. We cannot use road transportation because the minimum six day road transportation would put us further behind, and because of the extreme delicacy of the payload's instrumentation, its extremely high value (over \$100 million) and unique nature. Our customer, Canadian Telephone Company, requires that we not compromise the safety of the cargo by shipping via surface and exposing the payload to the risk associated with the extremely long haul from Eastern Pennsylvania to California.

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We must ship to Sunnyvale, California (Moffett Field) in order to complete work on the Telesat satellite. This entails incorporating, at Moffett Field, the necessary propulsion, solar panels, etc.; integration into the unit of these additional parts, and testing at Moffett Field prior to shipment. The completed satellite with payload must be shipped to Russia not later than May 28 in order to meet the scheduled July 1 launch date. The required May 28 shipment date from Moffett Field to Russia cannot be met unless the payload from Philadelphia arrives at Moffett Field on February 28. If unable to ship by air on the scheduled date from Philadelphia to Moffett Field, our current schedule will necessarily slip; we would be unable to meet the required May 28 shipment date from Moffett Field to Russia; miss the scheduled July 1 launch date, frustrate our customer's requirements and be subject to severe monetary penalties.

We are unable to use the services of any U.S. carrier because no such carrier has an aircraft on which this shipment can be loaded. We are unable to use truck transportation for the reasons above stated. Our time is short and our potential penalties are substantial.

I trust the foregoing will explain our immediate and urgent need for use of the AN124-100 aircraft for this mission.

Sincerely yours,



J.P. Bangle, Manager  
Logistics Support

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