

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

In the matter of)	
)	
WARREN C. HAVENS)	See Attachment A for Calls Signs and
)	Associated FCC File Nos.
SKYBRIDGE SPECTRUM FOUNDATION)	
)	
VERDE SYSTEMS, LLC)	
And its predecessor in interest, TELESaurus)	
VPC, LLC)	
)	
Applications for Waiver and/or Extension of the)	
Five and Ten Year Construction Deadlines)	
)	
Applications for Renewal of 220 MHz Licenses)	

Order on Reconsideration

Adopted: February 3, 2014

Released: February 3, 2014

By the Deputy Chief, Mobility Division, Wireless Telecommunications Bureau:

I. INTRODUCTION

1. For the reasons set forth below, we deny the Petition for Reconsideration filed by Warren C. Havens (“Warren Havens”), Telesaurus VPC, LLC (“Telesaurus”), Verde Systems, LLC (“Verde”), and Skybridge Spectrum Foundation (“Skybridge”)¹ of the Mobility Division’s (“Division”) May 31, 2012 Order² terminating 394 licenses held by the Petitioners.³ Petitioners assert that the Division erred by: (1)

¹ We note for the record that Warren Havens is the president of Verde, Telesaurus, and Skybridge and is a signatory to all of the applications addressed in this order. Where appropriate, we refer to filings, arguments, and assertions made by Warren Havens and his companies jointly as having been made by “Havens,” “Petitioners,” or “Applicants.” When referring to Warren Havens individually, we refer to him as “Warren Havens.”

² See Warren C. Havens, Skybridge Spectrum Foundation, Verde Systems, LLC and its predecessor in interest, Telesaurus VPC, LLC, Applications for Waiver and/or Extension of the Five and Ten Year Construction Deadlines, Applications for Renewal of 220 MHz Licenses, *Order*, 27 FCC Rcd 5841 (2012) (“Havens 220 MHz Termination Order”).

³ See Attachment A for a complete list of the 394 licenses, their associated call signs, the FCC file numbers of their associated applications, and their associated construction and renewal deadlines. Skybridge was the licensee for call signs WQHZ577-773 (“Skybridge Licenses”). Warren Havens was the licensee for call signs WPOI514-622, WPOI843, WPOJ290-306, WPOK862-869, WPOK871-889, WPOK893-900, and WPOK933. Verde was the licensee for call signs WPOK890-892 and WPOK901-926, and WPOK928-932 (these licenses were assigned from Telesaurus to Verde). Since, at different points in time with respect to the issues addressed in this order, Warren Havens filed jointly with Verde and Telesaurus, and Warren Havens is the president of both companies, we refer to the licenses most recently held by Warren Havens and Verde (previously, Telesaurus) collectively as the “Havens Licenses” except where reference to specific licenses or their respective licensees is necessary.

denying the renewal applications for the Skybridge Licenses; (2) denying the extension requests for the Havens Licenses; and (3) denying the Applicants' request for a fee waiver.⁴ Petitioners also request permission to submit evidence of additional "due diligence" pertinent to their extension and renewal requests.⁵ We hereby deny Havens' requests in full and reaffirm the Division's findings set forth in the Havens 220 MHz Termination Order.

II. BACKGROUND

2. The Havens Licenses were originally granted in 1999 as part of Auction 24.⁶ Pursuant to Section 90.767 of the Commission's rules, an Economic Area ("EA") or Regional Economic Area Grouping ("REAG") 220 MHz licensee must construct a sufficient number of base stations for land mobile and/or paging operations to "provide coverage to at least one-third of the population of its EA or REAG within five years of the issuance of its initial license and at least two-thirds of the population of its EA or REAG within ten years of the issuance of its initial license."⁷ Alternately, licensees may provide substantial service to their licensed area at the appropriate five-year and ten-year benchmarks.⁸ Further, pursuant to Section 1.946(c), "[i]f a licensee fails to commence service or operations by the expiration of its construction period or to meet its coverage or substantial service obligations by the expiration of its coverage period, its authorization terminates automatically, without specific Commission action, on the date the construction or coverage period expires."⁹

3. On January 12, 2004, Warren Havens filed requests for extension or removal of the five-year construction deadline set forth in Section 90.767(a) of the Commission's rules¹⁰ for his 220 MHz licenses.¹¹ Warren Havens argued, in part, that extension or waiver of the construction requirement was justified due to a lack of appropriate equipment available for use in the 220 MHz band.¹² In response, on July 13, 2004, the Wireless Telecommunications Bureau ("Bureau") released a *Memorandum Opinion and Order* extending the five-year construction deadlines to November 5, 2007 for all Phase II¹³ EA and REAG 220 MHz licenses that had filed requests for extension or whose first construction deadline fell

⁴ See Warren Havens, Skybridge Spectrum Foundation, and Verde Systems, LLC, Petition for Reconsideration of May 31, 2012 Order and Request to Permit Submission of Further Due Diligence Facts (July 2, 2012) ("Havens Petition for Reconsideration").

⁵ See Havens Petition for Reconsideration at 22-23.

⁶ See Phase II 220 MHz Spectrum Auction Closes, *Public Notice*, 14 FCC Rcd 11218 (July 1999). Some of the subject licenses were acquired by Havens in secondary market transactions after the close of Auction 24.

⁷ 47 C.F.R. § 90.767(a). For consistency, we refer to this as the "construction requirement" or "construction deadline."

⁸ *Id.*

⁹ 47 C.F.R. § 1.946(c).

¹⁰ 47 C.F.R. § 90.767(a).

¹¹ See Warren Havens, Petition to Waive or Extend the Five-Year Construction Requirement: Partial Waiver of Section 90.767, with requests to apply to other Regional and EA Licenses (Jan. 12, 2004) ("2004 Extension Request").

¹² 2004 Extension Request at 7-17.

¹³ See Amendment of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Service, *Third Report and Order*, 12 FCC Rcd 10943 (1997) ("*Third Report and Order*") (Establishing rules to govern the operation and licensing of the 220 MHz band, including the Phase II licenses.)

after the date of the order.¹⁴ The Bureau found that the public interest would be served by granting these 220 MHz licensees, including Warren Havens, this extension and that an additional three years would be sufficient time for the licensees to construct their systems using available or soon to be released equipment.¹⁵

4. On October 24, 2007, Warren Havens submitted applications to disaggregate a large portion of the spectrum in each of his 220 MHz licenses and assign it to Skybridge.¹⁶ Telesaurus filed similar applications on November 1, 2007.¹⁷ For each of the subject licenses, Warren Havens and Telesaurus maintained only a fraction of the original licensed spectrum.¹⁸ In addition, for each of the licenses, save for call sign WQHZ610, Warren Havens and Telesaurus indicated that the assignor would be responsible for meeting the construction deadlines set forth in Section 90.767 of the Commission's rules.¹⁹ For call sign WQHZ610, Warren Havens indicated that the assignor and assignee would be jointly responsible for meeting the build-out deadlines.²⁰ Warren Havens subsequently claimed that the difference in the WQHZ610 application was an administrative error and asked the Bureau to modify the application for to render it consistent with the applications for the other call signs.²¹

5. On November 4, 2007, Warren Havens and Telesaurus applied for waiver or further extension of the five-year construction deadline for their Licenses pursuant to Section 1.946(e) of the Commission's rules.²² Warren Havens and Telesaurus advanced several arguments in favor of their extension request, including that: (1) there was a continuing lack of 5 kHz trunked equipment for the 220 MHz band, hampering build-out capabilities; (2) that they had conducted extensive due diligence with respect to the use of Terrestrial Trunked Radio ("TETRA"), Digital Mobile Radio ("DMR"), and other Intelligent Transportation Systems ("ITS") for use in the 220 MHz band; (3) that the use of the Licenses for ITS in conjunction with 900 MHz LMS licenses held by Havens-affiliated entities constituted the best use of the spectrum; (4) that Warren Havens had acquired several of his Licenses in a bankruptcy proceeding that had not concluded until 2007; and (5) that the disaggregation of spectrum to Skybridge²³ constituted a donation for public interest uses.²⁴ In addition, Warren Havens and Telesaurus requested that they each be granted a consolidated license for their 220 MHz holdings and that some or all of the fees associated with the

¹⁴ See Warren C. Havens, Bizcom USA, and Cornerstone SMR, *Memorandum Opinion and Order*, 19 FCC Rcd 12994 ¶ 19 (WTB-2004) ("220 MHz Extension Order").

¹⁵ *Id.* at ¶ 20.

¹⁶ See FCC File No. 0003208764 disaggregating and assigning spectrum from call signs WPOI514-622, WPOI843, WPOJ290-306, WPOK862-864, WPOK866-869, WPOK871-877, WPOK879-889, and WPOK893-900, and WQHZ610; FCC File No. 0003218561 disaggregating and assigning call sign WPOK933; and FCC File No. 0003210896 disaggregating and assigning call signs WPOK865 and WPOK878.

¹⁷ See FCC File No. 0003218990 disaggregating and assigning spectrum from call signs WPOK891-892, WPOK901-908, WPOK910-925, and WPOK928-932; and FCC File No. 0003218951 disaggregating and assigning spectrum from call signs WPOK890, WPOK909, and WPOK926. The applications in notes 16 and 17 are collectively referred to as the "Havens Disaggregation Applications."

¹⁸ This varies from license to license but, in many cases, the original licensee retained 20 percent or less of the spectrum in each license area.

¹⁹ See Havens Disaggregation Applications, Schedule B.

²⁰ See FCC File No. 0003208764.

²¹ See WQHZ610 Petition at 1.

²² See 47 C.F.R. § 1.946(e); Warren Havens and Telesaurus VPC LLC, Petition to Waive or Extend the Five-Year Construction Requirement (filed November 4, 2007) ("2007 Extension Request").

²³ See *supra*, paragraph 4.

²⁴ 2007 Extension Request at 5-9.

Applications be waived.²⁵ Warren Havens and Telesaurus also argued that the Applications met the extension standards set forth in Section 1.946(e)(1) of the Commission's rules²⁶ and the waiver standard set forth in Section 1.925 of the Commission's rules.²⁷ However, they did not specifically plead the requisite elements of the waiver standard.²⁸ On June 27, 2008, Warren Havens and Telesaurus filed a supplement to the 2007 Extension Request that purported to show the applicants' due diligence in seeking to obtain TETRA technology for use with their Licenses.²⁹

6. On March 23, 2009, Warren Havens filed renewal applications for his Licenses.³⁰ In these Renewal Applications, Warren Havens argued that he and his companies engaged in substantial due diligence to research and develop ITS technology and services for use in the 220 MHz band.³¹ He also claimed that, "[h]ad the FCC ruled on the 2007 Extension Request, and it was granted, then [he] could have proceeded with the needed further development of technology and equipment to construct the licenses...and constructed today or, at minimum would have been much further along in completing due diligence to obtain the advanced 220 MHz technology and equipment for the nationwide ITS wireless plan for which the Licenses are dedicated..."³² He asserted that these showings, along with those set forth in the 2007 Extension Request and the March 2009 Amended Extension Request, were sufficient to satisfy the renewal and renewal expectancy requirements in Section 90.743³³ of the Commission's Rules.³⁴

7. On the same day, Warren Havens also filed an amendment to his 2007 Extension Request.³⁵ In this Amended Extension Request, Warren Havens requested an extension of both the five and ten-year construction deadlines for his Licenses until March 23, 2015.³⁶ Warren Havens again claimed that he had conducted substantial due diligence to obtain advanced wireless technology to put the 220 MHz spectrum to its highest and best use.³⁷ He also reiterated, and incorporated the arguments and assertions from his prior filings.³⁸

²⁵ *Id.* at 9-10.

²⁶ 47 C.F.R. § 1.946(e)(1).

²⁷ *See* 47 C.F.R. § 1.925; 2007 Extension Request at 4 and 9.

²⁸ *Id.* at 9 (The section titled "Section 1.946(e)(1) and Waiver Standards Met" states only that "[t]his is evident from the substance of this request").

²⁹ *See* Warren Havens and Telesaurus VPC, Supplement to Pending 220-222 MHz Extension Requests (filed June 27, 2008) ("June 2008 Supplement").

³⁰ *See* Warren Havens, 220 MHz Licenses: Renewal Applications (filed March 23, 2009) ("Havens March 2009 Renewal Applications").

³¹ *Id.* at 2-4 and Attachments 1-3.

³² *Id.* at 1.

³³ 47 C.F.R. § 90.743; *see infra*, Section III(C).

³⁴ *See* Havens March 2009 Renewal Applications at 4.

³⁵ *See* Warren C. Havens Regional and EA Licenses, Amendment of Pending 2007 Petition to Waive or Extend the Five-Year Construction Requirement and the Ten-Year Construction Requirement (filed March 23, 2009) ("March 2009 Amended Extension Request").

³⁶ *Id.* at 2.

³⁷ *Id.* at 4.

³⁸ *Id.* at 2-3.

8. On March 23, 2009, Skybridge also filed renewal applications for several of its Licenses.³⁹ Skybridge claimed that, pursuant to the earlier disaggregation and assignment action, its licenses do not include construction requirements.⁴⁰ As a result, according to Skybridge, it “has no substantial service obligation, and thus has no substantial service showing to make.”⁴¹ Skybridge asserted that it “is using all of the subject Licenses in active research and development, and thereafter deployment, of advanced wireless for the nation’s Intelligent Transportation Systems (‘ITS’) and associated smart critical infrastructure and environment-resource monitoring and protection...”⁴² However, Skybridge did not claim to have built any facilities or provide any actual service in its license areas. Skybridge also referenced the Havens March 2009 Renewal Applications in support of its claims.⁴³ Skybridge filed a similar renewal application for its remaining licenses on October 6, 2009, which referenced and incorporated the Skybridge March 2009 Renewal Applications and provided additional information regarding its plans to provide ITS, and specifically Network-RTK (“N-RTK”), services over its 220 MHz spectrum.⁴⁴

9. On October 7, 2009, Warren Havens and Verde filed a joint application to: (1) renew all of the Havens and Verde Licenses that were not included in the Havens March 2009 Renewal Applications; (2) amend and supplement the 2007 Extension Request for those Licenses that were not included in the Havens March 2009 Extension Request; and (3) obtain waivers of the fees associated with the renewal and extension filings.⁴⁵ This Application restated and incorporated many of the renewal and extension showings made in the prior filings of Warren Havens, Verde, and Skybridge.⁴⁶ In addition, Warren Havens and Verde argued that they had “demonstrated important research and developments to put the spectrum to the highest and best use... with a focus... in support of N-RTK which is one of the most important new forms of wireless for the nation.”⁴⁷ They also claimed that the Applications meet the waiver standard set forth in Section 1.925 of the Commission’s rules⁴⁸ because: (1) the future use of the licenses will be the highest and best use; (2) the licenses would be used by a nonprofit corporation that is legally required to use the licenses in direct support of government agency needs and other public interest purposes; (3) until recently, no commercially viable equipment was available for the subject spectrum and the equipment available now will require modification into N-RTK GNSS receivers; and (4) application of the construction deadline will frustrate the purpose of the rule.⁴⁹ Warren Havens and Verde argued that

³⁹ See Skybridge Spectrum Foundation, 220 MHz Licenses: Renewal Applications (filed March 23, 2009) (“Skybridge March 2009 Renewal Applications”).

⁴⁰ *Id.* at 1.

⁴¹ *Id.* at 1.

⁴² *Id.* at 1.

⁴³ *Id.* at 2.

⁴⁴ See Skybridge Spectrum Foundation, 220 MHz Licenses: Renewal Applications (filed October 6, 2009) (“Skybridge October 2009 Renewal Applications”) (See Attachment A for associated FCC file numbers). Except where reference to a specific application is necessary, we refer to the Skybridge March 2009 Renewal Applications and the Skybridge October 2009 Renewal Applications collectively as the “Skybridge Renewal Applications.”

⁴⁵ See Warren C. Havens and Verde Systems LLC, Fee Waiver and Refund Request, Amendment to Pending Extension Request Due to Lack of FCC Decision On It, Request for One “Ten Year” Construction Deadline of October 7, 2015, and Supportive Showing for Amended Extension Request, Renewal Expectancy Showing for Renewal Applications for all the Subject Licenses (filed October 7, 2009) (“Havens/Verde Extension and Renewal Applications”).

⁴⁶ *Id.*

⁴⁷ *Id.* at 8.

⁴⁸ 47 C.F.R. § 1.925.

⁴⁹ *Id.*

even though they have requested several construction deadline extensions, the amended Applications should be granted for “entirely clear public interest reasons” in that the spectrum at issue “will, at last, be put to an excellent purpose – one that did not exist until recently.”⁵⁰ However, Warren Havens and Verde did not claim that they were providing service, substantial or otherwise, within their respective license areas. On September 23, 2010, Warren Havens, Verde, and Skybridge filed a further supplement to their Extension and Renewal Applications to “demonstrate major additional due diligence and otherwise to support the previous requests for either extension or renewal as clearly in the public interest to grant.”⁵¹

10. On November 6, 2009, Maritime filed Petitions to Deny the Havens/Verde Extension and Renewal Applications, the Skybridge October 2009 Renewal Applications, and the associated request for a fee waiver.⁵² Maritime asserted that these Applications are procedurally defective and were filed improperly. Further, Maritime argued that Commission precedent compels denial of the applications and that Skybridge had not made its case for renewal.⁵³ Maritime also questioned Warren Havens’ candor based on his actions in other dockets.⁵⁴

11. On November 19, 2009, Warren Havens, Verde, and Skybridge filed an Opposition to Maritime’s Petition to Deny.⁵⁵ Havens argued that Maritime: (1) lacked standing to bring its Petition to Deny; (2) that the Petition to Deny was an impermissible “strike petition”; (3) and that the Petition contains numerous other procedural defects.⁵⁶ Havens also countered Maritime’s arguments regarding the validity of the Havens/Verde Extension and Renewal Requests.⁵⁷ Maritime filed a Reply to the Opposition on November 25, 2009.⁵⁸

12. On January 16, 2010, Warren Havens, Verde, and Skybridge submitted a supplement to the Applications and the Opposition.⁵⁹ In the Supplement, the Applicants again asserted that N-RTK is the highest and best use of the subject spectrum and presented evidence of their ongoing diligence to obtain

⁵⁰ *Id.* at 9.

⁵¹ See Warren Havens, Verde Systems LLC, and Skybridge Spectrum Foundation, Supplement to Extension and Renewal Applications (filed September 23, 2010) (“September 2010 Supplement”).

⁵² See Maritime Communications/Land Mobile LLC, *Petition to Deny* (filed November 6, 2009) (“Maritime Petition to Deny”); Maritime Communications/Land Mobile LLC, *Petition to Deny Fee Waiver Request* (filed November 6, 2009) (“Maritime Petition to Deny Fee Waiver”). All filings related to the Maritime Petition to Deny and subsequent replies, oppositions, supplements and other related filings apply to FCC file numbers: 0003990344-379, 0003989107-176, 0003990398-431, 0003223118-153, and 0003223081-114. See Attachment A for associated call signs.

⁵³ See Maritime Petition to Deny at 2-11.

⁵⁴ *Id.* at 11-14.

⁵⁵ See Warren Havens, Verde Systems, LLC, and Skybridge Spectrum Foundation, *Opposition to Maritime Petition to Deny* (filed November 19, 2009) (“Opposition to Maritime Petition to Deny”). All citations are to the errata version of the Opposition, which was filed on November 20, 2009.

⁵⁶ *Id.*

⁵⁷ *Id.*

⁵⁸ See Maritime Communications/Land Mobile LLC, *Reply to Opposition to Petition to Deny* (filed November 25, 2009) (“Maritime Reply”).

⁵⁹ See Warren Havens, Verde Systems, LLC, and Skybridge Spectrum Foundation, *Supplement to Applications and Opposition to Petition to Deny* (filed January 16, 2010) (“Havens January 2010 Supplement”); Warren Havens, Verde Systems, LLC, and Skybridge Spectrum Foundation, *Request to Accept Supplement to Applications and Opposition to Petition to Deny* (filed January 16, 2010) (“Havens Request to Accept January 2010 Supplement”).

the requisite technology and approvals to deploy N-RTK across the Havens and Skybridge Licenses.⁶⁰ On January 28, 2010, Maritime filed Oppositions to the January 2010 Supplement and the Request to Accept the January 2010 Supplement.⁶¹ Subsequently, on October 5, 2010, Maritime filed a Petition to Deny the Amended Applications, contending that the amendments “provided no information even to suggest that he [Havens] had constructed any facility during the ten years that he held the licenses...”⁶² Warren Havens, Verde, and Skybridge filed an Opposition to this Petition to Deny on October 20, 2010⁶³ and Maritime submitted a Reply on November 1, 2010.⁶⁴

13. On May 31, 2012, the Division released an Order granting Warren Havens’ petition for reconsideration of the pending termination status of call sign WQHZ610 and denying: (1) the Extension and Renewal Applications filed by Warren Havens, Verde, and Skybridge for all of the 220 MHz Licenses, including WQHZ610; (2) the requests for waivers of filing fees associated with the subject applications; and (3) the requests for consolidation of the subject licenses under a single call sign for each licensee.⁶⁵ The Division also dismissed as moot the Petitions to Deny filed by Maritime as well as all subsequent responsive filings by Maritime or Havens.⁶⁶

14. On July 2, 2012, Warren Havens, Verde, and Skybridge filed a Petition for Reconsideration of the Havens 220 MHz Termination Order along with an appendix containing seventeen supporting exhibits.⁶⁷ The Petitioners assert that the Division erred by: (1) denying the renewal applications for the Skybridge Licenses; (2) denying the extension requests for the Havens Licenses; and (3) denying the Applicants’ request for a fee waiver.⁶⁸ The Petitioners also submit purportedly new evidence supporting the earlier extension requests.⁶⁹

15. On July 16, 2012, Maritime filed an Opposition to Havens’ Petition for Reconsideration.⁷⁰ Maritime asserts that the Havens Petition for Reconsideration should be dismissed because: (1) it exceeds the maximum page limit for petitions for reconsideration set forth in Section 1.106(f) of the Commission’s rules;⁷¹ (2) Petitioners made a voluntary business decision not to provide service in any of its license areas;

⁶⁰ *Id.* at 5-7.

⁶¹ See Maritime Communications/Land Mobile LLC, *Opposition to Request to Accept Supplement to Applications and Opposition to Petition to Deny* (filed January 28, 2010) (“Maritime Opposition to Havens Request to Accept Supplement”); Maritime Communications/Land Mobile LLC, *Opposition to Supplement to Applications and Opposition to Petition to Deny* (filed January 28, 2010) (“Maritime Opposition to Havens January 2010 Supplement”).

⁶² See Maritime Communications/Land Mobile LLC, *Petition to Deny Amended Application* (filed October 5, 2010) (erratum filed October 7, 2010) (“Maritime Petition to Deny Amended Applications”).

⁶³ See Warren Havens, Verde Systems, LLC, and Skybridge Spectrum Foundation, *Opposition to Petition to Deny Amended Applications* (filed October 20, 2010) (“Havens Opposition to Petition to Deny Amended Applications”).

⁶⁴ See Maritime Communications/Land Mobile LLC, *Reply to Opposition to Petition to Deny Amended Application* (filed October 5, 2010) (“Maritime Reply to Opposition to Petition to Deny Amended Applications”).

⁶⁵ See Havens 220 MHz Termination Order. The reasoning and support for these actions is outlined in the discussion below addressing Havens’ Petition for Reconsideration, *infra* ¶¶ 21-40.

⁶⁶ See Havens 220 MHz Termination Order at ¶ 32.

⁶⁷ See Havens Petition for Reconsideration.

⁶⁸ See Havens Petition for Reconsideration.

⁶⁹ See Havens Petition for Reconsideration at 22-25.

⁷⁰ See Maritime Communications/Land Mobile, LLC – Debtor in Possession, *Opposition* (filed July 16, 2012) (“Maritime Opposition”).

⁷¹ 47 C.F.R. § 1.106(f).

and (3) that Havens fails to demonstrate that his claims are consistent with the precedents cited in the Petition for Reconsideration.⁷²

16. On July 27, 2012, Havens filed a Motion to Strike, Motion for Sanctions, and Reply to Maritime's Opposition.⁷³ Petitioners assert that Maritime's Opposition should be stricken from the record as an unauthorized individual filing by Dennis Brown who is not authorized to represent Maritime Communications/Land Mobile LLC – Debtor in Possession ("Maritime DIP").⁷⁴ According to Havens, Mr. Brown had not been approved as counsel by the Mississippi Bankruptcy Court at the time the Opposition was filed and, as such, could not represent Maritime DIP before the Commission.⁷⁵ Havens argues that Dennis Brown should be sanctioned as a result.⁷⁶ Havens also asserts that the Opposition did not cover all of the Havens Licenses and only mentions Verde and Warren Havens and, as such, should be dismissed as to those licenses and applications it did not specifically reference.⁷⁷ Havens also challenged Maritime's substantive claims and took the opportunity to submit additional evidence of continuing "due diligence" in developing the Havens Licenses.⁷⁸ Maritime filed an opposition to the motion to strike and request for sanctions on August 3, 2012.⁷⁹

III. DISCUSSION

17. After careful review of the record, including the arguments presented by the Petitioners and Maritime, we hereby deny the relief requested in the Petition for Reconsideration and reaffirm the findings in the Havens 220 MHz Termination Order. We also deny the Petitioners' request to submit additional "due diligence" in support of their claims. Finally, we dismiss the Maritime Opposition, Havens July 2012 Reply, and Maritime Opposition to Motion to Strike as moot.

A. Procedural Issues

1. Filing Requirements

18. The Petition for Reconsideration consists of 26 main body pages and over 250 pages of appendices and exhibits. Section 1.106 (f) of the Commission's rules states, in relevant part that "[t]he petition for reconsideration shall not exceed 25 double spaced typewritten pages."⁸⁰ Havens asserts that, when considering the Petition without the table of contents or summary, as permitted under section 1.49 of the Commission's Rules, the Petition is under 25 pages and that the requirements of section 1.49 do not apply to electronic filings.⁸¹ While we agree with Havens that the main body of his Petition complies with

⁷² See Maritime Opposition.

⁷³ See Warren C. Havens, Verde Systems, LLC, and Skybridge Spectrum Foundation, *Motion to Strike, Motion for Sanctions & Reply to Opposition to Petition for Reconsideration of May 31, 2012 Order* (filed July 27, 2012) ("Havens July 2012 Reply"). All references to the Havens July 2012 Reply refer to the revised version of that filing which was filed on August 1, 2012.

⁷⁴ *Id.* at 1-2.

⁷⁵ *Id.*

⁷⁶ *Id.* at 3.

⁷⁷ *Id.* at 3-4.

⁷⁸ *Id.* at 8-10 and Exhibit 1.

⁷⁹ Maritime Communications/Land Mobile, LLC – Debtor in Possession, *Opposition to Motion* (filed August 3, 2012) ("Maritime Opposition to Motion to Strike").

⁸⁰ 47 C.F.R. § 1.106 (f).

⁸¹ See Havens July 2012 Reply at 2.

the requirements of section 1.106, we do not agree that our filing rules do not apply to electronic filings.⁸² Moreover, the exhibits filed by Havens, which contain substantive arguments and commentary from the Petitioners,⁸³ far exceed the limits set forth in section 1.106.⁸⁴ Indeed, the Petition for Reconsideration contains exhibits and appendices totaling over 250 pages.⁸⁵

19. Page limits serve the important function of requiring parties to write concise pleadings that focus on the important issues raised in the pleading,⁸⁶ which allows both the decision-maker and opposing parties to focus on the key issues in a case. The Petitioners' filing greatly exceeds the page limits set forth in section 1.106 and represents a flagrant violation of the Commission's rules. Moreover, the Petitioners did not seek a waiver to exceed the Commission's clearly delineated page limits nor do we see a compelling reason to allow them to do so. Therefore, we find that the totality of the Petition for Reconsideration exceeds the maximum filing length set forth in the rules and, as such, the exhibits and appendices attached thereto shall be stricken.

2. Request to submit additional materials

20. Havens requests permission to supplement the 2007 Extension Requests to demonstrate "further due diligence."⁸⁷ Havens claims that these supplemental filings will include "facts, easily verified in public records, and supported by experts, that support the subject Applications and reversal of the Order."⁸⁸ However, Havens does not claim that this supplemental information includes evidence that any of the licensees have constructed any facilities within their license areas or provided service to any customer. Nor do the Petitioners claim this information would directly contradict our finding that the failure to construct was due to a voluntary business decision. A review of the record attached to the subject licensees reflects that from 2007 and 2010 Havens has submitted hundreds of pages of documentation in support of the purported due diligence efforts of the Petitioners which we have thoroughly examined.⁸⁹ Nevertheless, these filings were insufficient to support extension, waiver, or

⁸² See 47 C.F.R. § 1.49 (f) (3) ("For purposes of paragraph (b) and (c) of this section, and any prescribed pleading lengths, the length of any document filed in electronic form shall be equal to the length of the document if printed out and formatted according to the specifications of paragraph (a) of this section, or shall be no more than 250 words per page."). As a frequent participant in Commission proceedings, Mr. Havens should be aware of this rule. Indeed, the Commission recently rejected an Application for Review filed electronically by Mr. Havens and Skybridge for failure to comply with applicable page limit requirements. See *In the Matter of Skybridge Spectrum Foundation and Warren Havens On Request for Inspection of Records*, *Memorandum Opinion and Order*, FOIA Control Nos. 2013-021 and 2013-022, FCC 13-120 (rel. September 17, 2013).

⁸³ See Havens Petition for Reconsideration at 8 ("Petitioners include Appendix 1, attached hereto, that lists and describes 17 exhibits. The exhibits contain certain notations: all of the margin notes added, and highlights added, in the exhibits are referenced and incorporated into the text of the Petition.")

⁸⁴ See 47 C.F.R. § 1.106 (f).

⁸⁵ See Havens Petition for Reconsideration at Appendix 1 and exhibits 1-17.

⁸⁶ See *Fleming v. County of Kane*, 855 F.2d 496, 497 (7th Cir. 1988) (page limitations encourage litigants to hone their arguments and to eliminate excessive verbiage); *Snyder v. HSBC Bank, USA, N.A.*, 913 F. Supp.2d 755 (D. Ariz. 2012) (judicial economy and concise argument are purposes of the page limit); *Burger v. Kuimelis*, 325 F. Supp.2d 1026, 1031 (N.D. Cal. 2004) (the page limit forces moving parties to focus their discussion on the most important issues).

⁸⁷ See Havens Petition for Reconsideration at 23.

⁸⁸ *Id.*

⁸⁹ See *supra* ¶¶ 4-12.

renewal of any of the Havens Licenses.⁹⁰ Additional, similar information would not alter our analysis. Therefore, we deny Petitioners' request for permission to submit additional evidence into the record. To the extent that such additional evidence was submitted as an exhibit to the Havens July 2012 Reply, it is stricken as well.⁹¹

B. Skybridge Renewals

21. In the Havens 220 MHz Termination Order, we denied the Skybridge Renewal Applications on the grounds that they had not met the substantial service requirement to warrant renewal, as set forth in section 90.743 of the Commission's rules.⁹² Havens argues that, since Skybridge acquired the Skybridge Licenses via disaggregation and assignment from Verde and Warren Havens, and the construction obligations remained with the original licenses,⁹³ Skybridge should not have been required to meet a substantial service requirement to renew its licenses.⁹⁴ Specifically, Havens argues that "service and network construction are inexorably linked" and that, by requiring Skybridge to provide substantial service upon renewal, the Division effectively imposed a construction requirement on Skybridge where none existed.⁹⁵ Havens asserts that the Division's decision: (1) is inconsistent with the letter and purpose of the Commission's rules; (2) constituted the unlawful adoption of a substantive rule; and (3) constituted an unlawful ruling on a "novel question of law and fact."⁹⁶ We find these arguments unconvincing and deny the Petitioners' request to reinstate the Skybridge Licenses.

22. As an initial matter, the Petitioners' arguments misrepresent the Commission's rules and established precedent on this issue. As we stated in the Havens 220 MHz Termination Order, the Commission made it clear in establishing the partitioning and disaggregation rules for the 220 MHz service that the parties could choose which licensee or licensees would have responsibility for meeting the *construction* requirements for the post-partition/disaggregation licenses.⁹⁷ This flexibility is limited to construction requirements and does not extend to renewal requirements.⁹⁸ Indeed, the Commission noted that "if one party (generally the original licensee) certifies that it will meet all future construction requirements, the other party need only demonstrate that it is providing 'substantial service' for its remaining license."⁹⁹ Petitioners do not cite Commission precedents or provide any evidence that support their conclusory assertion that enforcing the explicit renewal requirements set forth in section 90.743 of the Commission's rules is somehow unlawful or improper.

⁹⁰ See e.g. June 2008 Supplement, Havens 2009 Renewal Applications, March 2009 Amended Extension Request, and Skybridge Renewal Applications.

⁹¹ See Havens July 2012 Reply at 9-10 and Attachments.

⁹² See Havens 220 MHz Termination Order at ¶¶ 26-29; 47 C.F.R. § 90.743 (a)(1).

⁹³ The exception being WQHZ610, which was inadvertently assigned to Skybridge with a joint construction requirement. See Havens Disaggregation Applications and WQHZ Petition. In the Havens 220 MHz Termination Order, we granted the request of Warren Havens and Skybridge to treat WQHZ610 as if the construction obligation had been retained by the original licensee. See Havens 220 MHz Termination Order at ¶ 15.

⁹⁴ See Havens Petition for Reconsideration at 11-16.

⁹⁵ *Id.* at 12.

⁹⁶ *Id.* at 13-16.

⁹⁷ See Havens 220 MHz Termination Order at ¶ 27 *quoting* Amendment of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Service, *Fifth Report and Order*, 13 FCC Rcd 24615, 24633 at ¶ 24 (1998) ("220 MHz Fifth R&O").

⁹⁸ See Havens 220 MHz Termination Order at ¶ 27 and 220 MHz Fifth R&O at ¶ 24.

⁹⁹ See 220 MHz Fifth R&O at ¶ 24.

23. In fact, the recent Uniform Renewal NPRM, which Petitioners cite in support of their arguments, fully reinforces the findings in the Havens 220 MHz Termination Order.¹⁰⁰ One of the main goals of the Uniform Renewal NPRM was to revise service specific geographic partitioning and disaggregation rules to require that each party to such an arrangement independently satisfy construction obligations under the applicable service rules.¹⁰¹ Havens cites a few sentences of the Commission's rules to support his assertion that "[o]nly the licenses of the party with the construction responsibility terminate by virtue of the failure to construct."¹⁰² However, in the same paragraph that Havens cites, the Commission states that "in services where there is currently no specific requirement to provide actual service to obtain renewal, a licensee could hold spectrum licenses without providing service indefinitely."¹⁰³ Here, the Commission once again draws a clear distinction between construction requirements and service requirements at renewal. Thus, in services with service requirements at renewal, such as the 220 MHz service, even licensees that have assigned their construction requirements to others must satisfy a separate standard to warrant renewal of partitioned or disaggregated licenses.

24. As a matter of policy, the Commission remains committed to the notion that "the goal of our construction requirements in both the partitioning and disaggregation contexts is to ensure that the spectrum is used to the same degree that would have been required had the partitioning or disaggregation transaction not taken place."¹⁰⁴ The Commission has not deviated from this longstanding policy and clearly reiterated it in the Uniform Renewal NPRM.¹⁰⁵ To do otherwise would encourage spectrum warehousing and disincentivize the valuable development and use of spectrum resources. Havens' position is clearly inconsistent with the text of the Commission's rules, the Commission's longstanding policies, and the public interest. Thus, in denying the Skybridge Renewal Applications, the Division simply applied the Commission's existing rules and policies in reaching its decision. Thus, the Division's actions were well within the scope of its delegated authority and did not constitute an unlawful rulemaking or an unlawful ruling on a unique question of law or fact.

C. Extension Requests

25. In the Havens 220 MHz Termination Order, the Division denied Petitioners' requests for extension or waiver of the construction deadlines for the Havens Licenses.¹⁰⁶ Under Section 1.946(e) of the Commission's rules, an extension of time to complete construction "may be granted if the licensee shows that the failure to meet the construction or coverage deadline is due to involuntary loss of site or other causes beyond its control."¹⁰⁷ Section 1.946 also lists specific circumstances where extension requests will not be granted, including delays caused by a failure to obtain financing, because the license undergoes a transfer of control, or because the licensee fails to order equipment in a timely manner.¹⁰⁸ The

¹⁰⁰ See Amendment of Parts 1, 22, 24, 27, 74, 80, 90, 95, and 101 To Establish Uniform License Renewal, Discontinuance of Operation, and Geographic Partitioning and Spectrum Disaggregation Rules and Policies for Certain Wireless Radio Services, *Notice of Proposed Rulemaking and Order*, 25 FCC Rcd 6996 ("Uniform Renewal NPRM").

¹⁰¹ *Id.* at ¶ 72.

¹⁰² See Havens Petition for Reconsideration at 13.

¹⁰³ See Uniform Renewal NPRM at ¶ 87.

¹⁰⁴ See Uniform Renewal NPRM at ¶ 77 quoting Geographic Partitioning and Spectrum Disaggregation by Commercial Mobile Radio Service Licensees, *Report and Order and Further Notice of Proposed Rulemaking*, 11 FCC Rcd 21831 (1996) at ¶ 61.

¹⁰⁵ *Id.*

¹⁰⁶ See Havens 220 MHz Termination Order at ¶¶ 16-25.

¹⁰⁷ See 47 C.F.R. § 1.946(e).

¹⁰⁸ See 47 C.F.R. § 1.946(e)(2)-(3).

applicable extension standard must be considered in conjunction with Section 309(j) of the Communications Act, as amended, which states that the Commission shall include performance requirements to ensure prompt delivery of services, to prevent stockpiling and warehousing of spectrum by licensees, and to promote investment and deployment of new technologies and services.¹⁰⁹ We found that “(1) Applicants have not provided actual service in their license areas; (2) this failure was not caused by circumstances beyond their control; (3) the claimed due diligence, conceptual plans, or other factors described in Applicants’ filings do not support a further extension of the construction deadline; (4) Applicants have presented no compelling precedent or evidence to support their request for special considerations based on their donation of spectrum to Skybridge or their acquisition of certain 220 MHz licenses during a bankruptcy proceeding; and (5) allowing Warren Havens and Verde to continue to hold these licenses without constructing facilities or providing any actual service would undermine the purpose of the Commission’s rules and Section 309(j) of the Communications Act.”¹¹⁰

26. The Division also found that the Petitioners had failed to meet the standard for waiver of the construction requirements as set forth in section 1.925 of the Commission’s rules.¹¹¹ Specifically, the Petitioners had not presented evidence to establish that enforcement of the construction deadline would undermine the purpose of the rule or be otherwise inequitable, unduly burdensome, or contrary to the public interest.¹¹² Indeed, the Division found that “granting the Applicants’ waiver request would harm the public interest since it would run counter to established Commission precedent and could encourage other present and future licensees to voluntarily pursue regulatory relief instead of providing actual service in their license areas.”¹¹³

27. In the Petition for Reconsideration, Havens argues that the Division erred in denying the 2007 Extension Request.¹¹⁴ Havens claims that the Division:¹¹⁵ (1) disregarded the public interest in reaching its decision and, specifically, ignored the “highest and best use of the spectrum;” (2) failed to consider supporting evidence submitted by Havens; (3) improperly relied on its own expertise rather than the expertise of outside experts in assessing the supporting evidence submitted by Havens; (4) failed to consider the public interest benefits of non-profit spectrum use; and (5) failed to take a “hard look” at the Petitioners’ waiver request as required by the Commission’s rules.¹¹⁶ Havens also asserts that the Division violated the Petitioners’ equal protection rights since the Commission has granted waivers or extensions to other licensees in the 220 MHz service.¹¹⁷ For the reasons set forth below, we find the Petitioners’ arguments to be without merit and reaffirm the Division’s denial of the Extension Requests.

¹⁰⁹ See 47 U.S.C § 309(j)(4)(B).

¹¹⁰ See Havens 220 MHz Termination Order at ¶ 20.

¹¹¹ 47 C.F.R. § 1.925. Under Section 1.925 of the Commission’s rules, a waiver may be granted if the petitioner establishes either that: (1) the underlying purpose of the rule would not be served or would be frustrated by application to the instant case, and that grant of the waiver would be in the public interest; or (2) where the petitioner establishes unique or unusual factual circumstances, application of the rule would be inequitable, unduly burdensome, or contrary to the public interest, or the applicant has no reasonable alternative.

¹¹² See Havens 220 MHz Termination Order at ¶ 24.

¹¹³ See Havens 220 MHz Termination Order at ¶ 24.

¹¹⁴ Havens Petition for Reconsideration at 16.

¹¹⁵ Havens consistently refers to the decisions of “the Bureau” throughout the Petition for Reconsideration. However, the Order was released by the Mobility Division.

¹¹⁶ See Havens Petition for Reconsideration at 16-22.

¹¹⁷ See Havens Petition for Reconsideration at 23-24.

1. The Division's Decision was in the Public Interest.

a. Highest and Best Use of the Spectrum

28. Havens errs in claiming that the Division disregarded the public interest by failing to consider the highest and best use of the 220 MHz spectrum held by the Licensees.¹¹⁸ The Division's decision was based largely on the fact that Havens did not provide any actual service in the applicable license areas and that this failure was due to voluntary decisions made by the Petitioners.¹¹⁹ As we noted, it is well established that voluntary business decisions are not circumstances beyond the licensee's control for the purposes of satisfying the requirements of section 1.946.¹²⁰ Petitioners acknowledge that, unlike other 220 MHz licensees,¹²¹ they chose not to avail themselves of readily available technology to deploy service in the 220 MHz band.¹²² Instead, they chose to pursue other technologies for which appropriate equipment was not available.¹²³ One could not ask for a better example of a voluntary business decision.

29. Petitioners rely on recent waivers granted to Sprint Nextel Inc. to support their assertion that they are entitled to an extension based on their pursuit of supposedly superior technology in the band.¹²⁴ However, Sprint-Nextel's waiver requests are easily distinguished on both factual and legal grounds. Sprint-Nextel requested a declaratory ruling modifying the narrowbanding requirements in Section 90.209 of the Commission's rules¹²⁵ to update their existing subscriber network using CDMA technology in the 800 MHz SMR band along with interim waivers of these requirements in designated license areas.¹²⁶ The Commission denied the Sprint-Nextel Petition, but granted the waiver requests and ultimately changed the narrowbanding requirements in the SMR Flexibility Order.¹²⁷ At no time did Sprint request an extension of its construction deadlines for these license areas. Rather, Sprint sought a universal modification of the Commission's rules to augment its existing network to facilitate the deployment of advanced communications technology. Furthermore, Sprint was already providing service to customers in these license areas in accordance with the Commission's rules. Thus, Sprint-Nextel's request is factually and legally distinct from the extensions sought by the Petitioners and the Commission's actions in that

¹¹⁸ See Havens Petition for Reconsideration at 16-18.

¹¹⁹ See Havens 220 MHz Termination Order at ¶¶ 16-21.

¹²⁰ See 47 C.F.R. § 1.946(e).

¹²¹ See, e.g., Coverage Notifications of Data Radio Management Co, Inc. for Call Signs WPOK830, WPOK831, and WPOK834 (filed October 7, 2009); Coverage Notifications of ESP Wireless Technology Group for Call Signs WPOJ377 and WPOJ389 (filed April 13, 2009); Coverage Notifications of Communications Specialists Inc. for Call Signs WPOI493, WPOI494, WPOI495, WPOI496, WPOI497 (filed January 6, 2009).

¹²² See Havens Petition for Reconsideration at 16-17.

¹²³ *Id.*; See also 2007 Extension Request at 4-7 and Exhibits; June 2008 Supplement; September 2010 Supplement; Havens/Verde Extension and Renewal Applications at 4-9.

¹²⁴ See Havens Petition for Reconsideration at 18; Improving Spectrum Efficiency Through Flexible Channel Spacing and Bandwidth Utilization for Economic Area-based 800 MHz Specialized Mobile Radio Licensees, *Report and Order*, WT Docket Nos. 12-64, 11-110, 27 FCC Rcd 6489 (rel. May 24, 2012) (SMR Flexibility Order) at note 21.

¹²⁵ 47 C.F.R. § 90.209.

¹²⁶ See SMR Flexibility Order, 27 FCC Rcd 6491-6493 at ¶¶ 5-7; Request for Declaratory Ruling that the Commission's Rules Authorize Greater than 25 kHz Bandwidth Operations in the 817-824/862-869 MHz Band, *Petition for Declaratory Ruling*, WT Docket No. 11-110 (filed June 3, 2011) (Sprint-Nextel Petition).

¹²⁷ See SMR Flexibility Order, 27 FCC Rcd 6493-6501 at ¶¶ 8-18; Sprint-Nextel Petition; Sprint-Nextel Call Signs WPLM660, WPLM661, WQNX442, WQNX443, WQNX444, WQOQ770, WQOQ771, WQOQ772, and WQOQ823.

proceeding have no precedential effect here.

30. With regards to the appropriate use of the spectrum, Petitioners correctly state that the Commission is concerned with ensuring the highest and best use of radio spectrum.¹²⁸ One of the ways that the Commission promotes spectrum being put to its highest and best use is through rules that require licensees to actually construct facilities and deploy service. As we stated in the Order, “[w]hile licensees are free to investigate, invest in, and pursue a wide range of technologies and service options, regulatory compliance is ultimately demonstrated by material accomplishments in the use of the spectrum resource to provide service.”¹²⁹ The Petitioners focus solely on their own interpretation of the highest and best use of the spectrum, to provide ITS services, while ignoring the essential requirement to provide service within the timeframe set forth in the Commission’s rules.

b. Supplementary Information did not Support Extension or Waiver of the Construction Requirements.

31. In the Petition for Reconsideration, Petitioners claim that the Division disregarded “extensive evidence” that they submitted in support of the 2007 Extension Requests.¹³⁰ This “evidence” includes hundreds of pages of information included in the Petitioners filings, websites related to TETRA, *ex parte* filings in WT Docket No. 06-49, and other supplementary materials.¹³¹ Petitioners claim that these filings show the value of TETRA and ITS technologies and demonstrate their due diligence in pursuing these technologies for use in the 220 MHz band.¹³² Petitioners argue that these supplemental filings support their request for waiver or extension of the construction deadlines and that the Division failed to give these materials due consideration in reaching its decision.¹³³ Petitioners also claim that the Division should have deferred to the expert reports submitted by the Petitioners in reaching its decision.¹³⁴

32. Our review gave serious consideration to Petitioners’ waiver request, despite the fact that Petitioners did not plead the elements of the waiver standard in the 2007 Extension Requests¹³⁵ and provided scant support for their requests even in later pleadings.¹³⁶ However, the requirement to take a “hard look” at pending waiver requests¹³⁷ does not require the Division to provide detailed analysis of each piece of purported supplementary material provided by Petitioners. As noted in the Havens 220 MHz Termination Order, Division staff reviewed each of the filings submitted by the Petitioners in reaching its

¹²⁸ The term “highest and best use” is not used in the Communications Act. However, it does appear on the Commission’s website and accurately encapsulates one aspect of the Commission’s responsibility with regards to regulation of spectrum. See FCC, “What We Do,” available at: <http://www.fcc.gov/what-we-do>.

¹²⁹ See Havens 220 MHz Termination Order at ¶ 20.

¹³⁰ See Havens Petition for Reconsideration at 18.

¹³¹ See Havens Petition for Reconsideration at 18-19 (listing supplementary materials submitted in support of the 2007 Extension Requests).

¹³² See Havens Petition for Reconsideration at 18-22. See also 2007 Extension Request; June 2008 Supplement, Havens 2009 Renewal Applications, March 2009 Amended Extension Request, and Skybridge Renewal Applications.

¹³³ See Havens Petition for Reconsideration at 20-21.

¹³⁴ See Havens Petition for Reconsideration at 21-22.

¹³⁵ See 2007 Extension Request at 9 (asserting that satisfaction of the waiver standards is “evident from the substance of the request”).

¹³⁶ See Havens/Verde Extension and Renewal Application at 8-9.

¹³⁷ See Havens Petition for Reconsideration at 20-21.

decision.¹³⁸ These materials support our finding that the Petitioners' failure to satisfy the construction requirements was wholly due to their voluntary decision to pursue technology and business strategies that were unsupported by the existing technology ecosystem of the band. Moreover, nothing in the supporting documentation indicates that the Petitioners have satisfied the requirements of section 1.925.¹³⁹ As we stated in the Havens 220 MHz Order, "we do not believe that the Applicants have presented convincing evidence that enforcement of the construction deadline would frustrate the purpose of the rule or be otherwise inequitable, unduly burdensome, or contrary to the public interest."¹⁴⁰ Indeed, granting a waiver or extension to the Petitioners would undermine the very purpose of the construction obligations, contradict Commission precedent, encourage spectrum warehousing, and run counter to the public interest.

33. Finally, the Petitioners' contention that the Division should have deferred to the opinions expressed in the expert reports appended to their filings with regard to TETRA and ITS is both unfounded and irrelevant.¹⁴¹ In this case, appropriate Division personnel reviewed the reports and supplemental information submitted by Havens. However, these submissions did not address issues relevant to the disposition of this case. The Petitioners' reports dealt with the purported value of the new technologies and services that Havens sought to deploy but did not present evidence that Havens had actually deployed any such technology or satisfied the elements of the applicable extension or waiver standards. The potential merits of these technologies and services have no bearing on whether the Petitioners satisfied the Commission's requirements for extension or waiver of the applicable construction requirements. Thus, in reaching its decision, the Division did not, as Havens claims, "counter an expert report with a non-expert opinion."¹⁴² Rather, the Division properly found these "expert reports" to be substantively irrelevant to the Petitioners' waiver and extension requests.¹⁴³

c. Skybridge's Non-Profit Status Does Not Entitle Petitioners to Extension or Waiver of the Construction Requirements

34. The Division also gave proper weight to Petitioners claims for special consideration based on Skybridge's non-profit status.¹⁴⁴ Havens has provided no support for his contention that a non-profit licensee is entitled to special consideration in applications for extension or waiver of its construction requirements.¹⁴⁵ The mere fact that a licensee is a non-profit organization does not entitle such an organization to a waiver of any regulation under section 1.925 of the Commission's rules.¹⁴⁶ The Commission's rules make no distinction between for-profit and non-profit entities for purposes of determining compliance with construction requirements and Havens has provided no precedent to support a deviation from this policy.

35. In short, the public interest cannot be served solely by promises of future deployment. At some point theory must give way to action and "due diligence" must yield tangible results. For Havens that time has long since passed. Petitioners have held the Havens Licenses since 1999 and yet have failed to construct facilities or provide service in any of their license areas, even as other licensees have begun to

¹³⁸ See Havens 220 MHz Termination Order at ¶ 24.

¹³⁹ See *id.*

¹⁴⁰ *Id.*

¹⁴¹ See Havens Petition for Reconsideration at 21-22.

¹⁴² See Havens Petition for Reconsideration at 21.

¹⁴³ See Havens 220 MHz Termination Order at ¶¶ 20, 24.

¹⁴⁴ See Havens 220 MHz Termination Order at ¶ 23-25.

¹⁴⁵ See Havens Petition for Reconsideration at 22.

¹⁴⁶ See 47 C.F.R. § 1.925.

offer meaningful service in the 220 MHz band. Instead, the Licensees made the voluntary decision to pursue technologies that, whatever their theoretical merits, were not supported by the existing 220 MHz device ecosystem. Thus, we find that the public interest is best served by affirming the termination of the Havens Licenses and allowing other parties the opportunity to make actual use of the spectrum resource.

2. The Division's Decision did not Violate Havens' Equal Protection Rights

36. Havens argues that, because the Division has granted extensions to other 220 MHz license holders, Havens is entitled to the same treatment on equal protection grounds.¹⁴⁷ Havens also argues that, since the Commission has granted waivers of construction requirements for similarly situated parties, it is required to waive the construction requirements for the Havens Licenses.¹⁴⁸ These claims are wholly without merit and misrepresent the Commission's legal obligations and applicable precedent.

37. As an initial matter, Havens misrepresents the Division's actions with regard to other 220 MHz licensees. The mere fact that the Commission has granted extensions or waivers to select 220 MHz licensees due to the unique circumstances of their claims does not entitle Petitioners to the same outcome. As we noted in the Havens 220 MHz Termination Order, our denial of the Havens Extension Requests is wholly consistent with our treatment of similarly situated licensees.¹⁴⁹ We have consistently denied extension requests from licensees in the 220 MHz band when those licensees made the voluntary decision not to deploy available equipment to provide service within their license areas.¹⁵⁰ This approach is also consistent with our treatment of similarly situated licensees in the 218-219 MHz band.¹⁵¹

38. The Petitioners cite three instances where the Commission or the Bureau granted certain 220 MHz license holders extensions or waivers of their construction requirements based on unique factual circumstances not present in this proceeding.¹⁵² Havens makes no attempt to connect the facts in these

¹⁴⁷ See Havens Petition for Reconsideration at 23.

¹⁴⁸ See Havens Petition for Reconsideration at 24.

¹⁴⁹ See Havens 220 MHz Termination Order at ¶ 21.

¹⁵⁰ See Havens 220 MHz Termination Order, note 85, *citing* Letter dated June 26, 2009, from Roger S. Noel, Chief, Mobility Division, Wireless Telecommunications Bureau, to Nancy J. Douglas, Douglas SMR Works, Inc., 24 FCC Rcd 8596 (WTB-MD 2009); Letter dated June 26, 2009, from Roger S. Noel, Chief, Mobility Division, Wireless Telecommunications Bureau, to Robert LaRue, Know LaRue Separate Property Trust, 24 FCC Rcd 8621 (WTB-MD 2009); Letter dated June 26, 2009, from Roger S. Noel, Chief, Mobility Division, Wireless Telecommunications Bureau, to Kansas City Wireless Partners, LLP, 24 FCC Rcd 8625 (WTB-MD 2009); Letter dated June 26, 2009, from Roger S. Noel, Chief, Mobility Division, Wireless Telecommunications Bureau, to David G. Boyle, 24 FCC Rcd 8600 (WTB-MD 2009).

¹⁵¹ See Havens 220 MHz Termination Order, note 85, *citing* Letter dated May 31, 2005 from Katherine M. Harris, Deputy Chief, Mobility Division, Wireless Telecommunications Bureau, to Buddy C. Stanley, ITV, Inc., 20 FCC Rcd 9548, *recon den.*, Application of ITV, Inc., *Memorandum Opinion and Order*, 22 FCC Rcd 1908 (WTB-CWD 2007); Letter dated January 31, 2007, from Thomas P. Derenge, Deputy Chief, Mobility Division, Wireless Telecommunications Bureau, to Stephen E. Coran, Esquire, Counsel for U.S. Telemetry, 22 FCC Rcd 1921 (WTB-MD 2007).

¹⁵² See National Rural Telecommunications Cooperative Request for Clarification or Extension of Time to Construct a 220-222 MHz Nationwide Land Mobile Radio System, *Order*, 15 FCC Rcd 6637 (WTB, Commercial Wireless Division - 1999) (Granting a limited one-year extension of Phase I license construction deadlines to allow licensee to align its Phase I licenses with its existing Phase II authorizations); Request of PTC-220, LLC for Waivers of Certain 220 MHz Rules, *Memorandum Opinion and Order*, WT Docket No. 08-256, 24 FCC Rcd 8537 (WTB - 2009) (Granting PTC-220, LLC a conditional waiver of construction requirements to allow it to construct a system that complies with a Congressional mandate to construct a nationwide positive train control system); Niagara Mohawk Power Corporation Call Signs WPCW863, WPCX746, WPCX405, WPCX407, WPCX408, WPCV961, WPCV948 and WPCV949 Request for Extension of Time to construct and operate its 220-222 MHz Land Mobile
(continued....)

cases to his arguments beyond the false assertion that, since the Commission granted waivers in these cases, they constitute binding precedent for the Commission to grant the requests of the Petitioners.¹⁵³ As Havens himself notes, the Commission is required to take a hard look at individual applications for waiver, and decide each case on its merits.¹⁵⁴ The petitioners in the cases cited by Havens met the Commission's standards for waiver or extension of the Construction requirements by demonstrating that their unique circumstances qualified them for relief and that granting such relief would be in the public interest, in accordance with the Commission's rules. The Petitioners, like the other 220 MHz licensees listed in footnote 149,¹⁵⁵ did not meet these requirements. Consequently Petitioners are not entitled to the relief they seek.

D. Fee Waiver Requests

39. Havens claims that the Division erred in denying the Petitioners' request for waiver of fees associated with the Extension and Waiver Requests.¹⁵⁶ Petitioners claim that the Division: (1) failed to take a hard look at the request for waiver; (2) neglected to provide a reasoned basis for its decision; and (3) improperly used denial of the underlying applications as a basis for denying the waiver requests.¹⁵⁷ What Petitioners fail to mention is that they never once plead the required elements of their waiver request with specificity.

40. As Petitioners correctly point out, Section 1.1119 of the Commission's rules¹⁵⁸ requires that fee waiver requests be filed separately from the underlying pleading.¹⁵⁹ This means that Petitioners are required to satisfy the elements of the waiver standard set forth in Section 1.925 of the Commission's rules specifically for the fee waiver request.¹⁶⁰ Petitioners simply state that the fee waiver request should be granted for the same reasons that their other waiver and extension requests should be granted.¹⁶¹ Such

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Systems, *Order*, 9 FCC Rcd 4838 (Private Radio Bureau, Licensing Division – 1994) (Granting an eight month extension of licensee's construction requirements to allow licensee to complete coordination negotiations with Canada); *See also* Maritel, Inc. Request for Waiver of Part 80 Regulations to Permit Use of 12.5 kHz Radio Equipment Operating in the 156-162 MHz Frequency Band, *Order*, 16 FCC Rcd 9294 (WTB, Public Safety and Private Wireless Division – 2001) (Havens cites Maritel as an example of a similarly situated party that was granted a waiver of its construction requirements. Maritel actually asked for and received a waiver of the Commission's Part 80 rules to permit the certification of equipment capable of operating on 12.5 kHz offset channels in the 156-162 MHz band).

¹⁵³ *See* Havens Petition for Reconsideration at 23-24.

¹⁵⁴ *See* Havens Petition for Reconsideration at 23-24; *See also* WAIT Radio, Inc. v. FCC, 418 F.2d 1153, 1157 (D.C. Cir. 1969); K. Rupert Murdoch (Transferor) and Fox Entertainment Group (Transferee) Applications for Transfer of Control of Fox Television Stations, Inc., *Memorandum Opinion and Order on Reconsideration*, 24 FCC Rcd 5824, 5828 (2009) at ¶ 16 (“the Commission is obligated to take a “hard look” at waiver requests to determine whether the application of a rule in a particular circumstance would disserve the public interest”).

¹⁵⁵ *See supra* note 149.

¹⁵⁶ *See* Havens Petition for Reconsideration at 25.

¹⁵⁷ *See* Havens Petition for Reconsideration at 25.

¹⁵⁸ 47 C.F.R. § 1.119.

¹⁵⁹ *See* Havens Petition for Reconsideration at 24-25.

¹⁶⁰ 47 C.F.R. § 1.925.

¹⁶¹ *See* Havens 2007 Extension Request at 10 (“the above waiver request to grant consolidated licenses should be granted in the public interest, and if granted, then there would be only one extension request and one fee for it, not the large numbers of fees paid when this extension request is submitted, and (ii) the substantial ongoing due diligence (which will benefit the larger 220 MHz market also), the special bankruptcy circumstance noted above, the
(continued....)

conclusory statements do not constitute a “separate pleading” as required by Section 1.119 and are insufficient to satisfy the requirements of Section 1.925. As such, we uphold our earlier denial of the Petitioners’ request for waiver of application fees.

E. Maritime Petitions and Havens Responses

41. As detailed above, Maritime filed an opposition to the Petition for Reconsideration which Havens subsequently opposed.¹⁶² However, since we reached our conclusions without the need for any of the information included in these filings, we hereby dismiss the Maritime Opposition, Havens July 2012 Reply, and Maritime Opposition to Motion to Strike as moot.¹⁶³

IV. CONCLUSION

42. For the reasons set forth above, the Havens Petition for Reconsideration is denied in its entirety and all of the decisions set forth in the Havens 220 MHz Termination Order are hereby affirmed.

V. ORDERING CLAUSES

43. Accordingly, IT IS ORDERED that, pursuant to Section 1.106 of the Commission’s Rules, 47 C.F.R., § 1.106, the Petition for Reconsideration filed by Petitioners is DENIED.

FEDERAL COMMUNICATIONS COMMISSION

Thomas Derenge
Deputy Chief, Mobility Division
Wireless Telecommunications Bureau

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special involvement of SSF (and support of SSF by the charitable assignments of 220 MHz spectrum from Applicants to SSF), and applicants commitment to high public interest wireless with all of the subject 220 MHz spectrum (as described at www.telsaurus.com) all warrant grant of this fee waiver request”); Havens/Verde Extension and Renewal Applications at 2 (“It is clearly in the public interest for the FCC to find that SSF’s use of its 220-222 MHz spectrum, along with its use of the Licensees 220-222 MHz spectrum under the just described option and lease, warrants a waiver of the fees paid with the Havens and VSL renewal applications filed today for the above-captioned call signs, as it warrants a waiver of the fees that SSF paid for its 220-222 MHz renewal applications filed on October 6, 2009...”)

¹⁶² See Maritime Opposition and Havens July 2012 Reply.

¹⁶³ See Maritime Opposition, Havens July 2012 Reply, and Maritime Opposition to Motion to Strike.

ATTACHMENT A

License Grant Date	Call Sign	Licensee Name	First Construction Deadline	Second Construction Deadline	Extension Request - FCC File Number	Renewal Application - FCC File Number	License Expiration Date
03/23/99	WPOI514	Havens, Warren C	11/05/07	03/23/09	0003222953	0003783529	03/23/09
03/23/99	WPOI515	Havens, Warren C	11/05/07	03/23/09	0003222954	0003783599	03/23/09
03/23/99	WPOI516	Havens, Warren C	11/05/07	03/23/09	0003222955	0003783530	03/23/09
03/23/99	WPOI517	Havens, Warren C	11/05/07	03/23/09	0003222956	0003783609	03/23/09
03/23/99	WPOI518	Havens, Warren C	11/05/07	03/23/09	0003222957	0003783531	03/23/09
03/23/99	WPOI519	Havens, Warren C	11/05/07	03/23/09	0003222958	0003783532	03/23/09
03/23/99	WPOI520	Havens, Warren C	11/05/07	03/23/09	0003222959	0003783620	03/23/09
03/23/99	WPOI521	Havens, Warren C	11/05/07	03/23/09	0003222960	0003783626	03/23/09
03/23/99	WPOI522	Havens, Warren C	11/05/07	03/23/09	0003222961	0003783533	03/23/09
03/23/99	WPOI523	Havens, Warren C	11/05/07	03/23/09	0003222962	0003783641	03/23/09
03/23/99	WPOI524	Havens, Warren C	11/05/07	03/23/09	0003222963	0003783534	03/23/09
03/23/99	WPOI525	Havens, Warren C	11/05/07	03/23/09	0003222964	0003783600	03/23/09
03/23/99	WPOI526	Havens, Warren C	11/05/07	03/23/09	0003222965	0003783642	03/23/09
03/23/99	WPOI527	Havens, Warren C	11/05/07	03/23/09	0003222966	0003783535	03/23/09
03/23/99	WPOI528	Havens, Warren C	11/05/07	03/23/09	0003222967	0003783536	03/23/09
03/23/99	WPOI529	Havens, Warren C	11/05/07	03/23/09	0003222968	0003783537	03/23/09
03/23/99	WPOI530	Havens, Warren C	11/05/07	03/23/09	0003222969	0003783538	03/23/09
03/23/99	WPOI531	Havens, Warren C	11/05/07	03/23/09	0003222970	0003783627	03/23/09
03/23/99	WPOI532	Havens, Warren C	11/05/07	03/23/09	0003222971	0003783640	03/23/09
03/23/99	WPOI533	Havens, Warren C	11/05/07	03/23/09	0003222972	0003783539	03/23/09
03/23/99	WPOI534	Havens, Warren C	11/05/07	03/23/09	0003222973	0003783540	03/23/09
03/23/99	WPOI535	Havens, Warren C	11/05/07	03/23/09	0003222974	0003783541	03/23/09
03/23/99	WPOI536	Havens, Warren C	11/05/07	03/23/09	0003222975	0003783601	03/23/09
03/23/99	WPOI537	Havens, Warren C	11/05/07	03/23/09	0003222976	0003783643	03/23/09
03/23/99	WPOI538	Havens, Warren C	11/05/07	03/23/09	0003222977	0003783542	03/23/09
03/23/99	WPOI539	Havens, Warren C	11/05/07	03/23/09	0003222978	0003783543	03/23/09
03/23/99	WPOI540	Havens, Warren C	11/05/07	03/23/09	0003222979	0003783544	03/23/09
03/23/99	WPOI541	Havens, Warren C	11/05/07	03/23/09	0003222980	0003783616	03/23/09
03/23/99	WPOI542	Havens, Warren C	11/05/07	03/23/09	0003222981	0003783628	03/23/09
03/23/99	WPOI543	Havens, Warren C	11/05/07	03/23/09	0003222982	0003783545	03/23/09
03/23/99	WPOI544	Havens, Warren C	11/05/07	03/23/09	0003222983	0003783546	03/23/09
03/23/99	WPOI545	Havens, Warren C	11/05/07	03/23/09	0003222984	0003783547	03/23/09
03/23/99	WPOI546	Havens, Warren C	11/05/07	03/23/09	0003222985	0003783602	03/23/09
03/23/99	WPOI547	Havens, Warren C	11/05/07	03/23/09	0003222986	0003783621	03/23/09
03/23/99	WPOI548	Havens, Warren C	11/05/07	03/23/09	0003222987	0003783610	03/23/09
03/23/99	WPOI549	Havens, Warren C	11/05/07	03/23/09	0003222988	0003783548	03/23/09
03/23/99	WPOI550	Havens, Warren C	11/05/07	03/23/09	0003222989	0003783644	03/23/09
03/23/99	WPOI551	Havens, Warren C	11/05/07	03/23/09	0003222990	0003783549	03/23/09
03/23/99	WPOI552	Havens, Warren C	11/05/07	03/23/09	0003222991	0003783550	03/23/09
03/23/99	WPOI553	Havens, Warren C	11/05/07	03/23/09	0003222992	0003783629	03/23/09
03/23/99	WPOI554	Havens, Warren C	11/05/07	03/23/09	0003222993	0003783551	03/23/09
03/23/99	WPOI555	Havens, Warren C	11/05/07	03/23/09	0003222994	0003783552	03/23/09
03/23/99	WPOI556	Havens, Warren C	11/05/07	03/23/09	0003222995	0003783603	03/23/09
03/23/99	WPOI557	Havens, Warren C	11/05/07	03/23/09	0003222996	0003783553	03/23/09
03/23/99	WPOI558	Havens, Warren C	11/05/07	03/23/09	0003222997	0003783611	03/23/09
03/23/99	WPOI559	Havens, Warren C	11/05/07	03/23/09	0003222998	0003783554	03/23/09
03/23/99	WPOI560	Havens, Warren C	11/05/07	03/23/09	0003222999	0003783555	03/23/09
03/23/99	WPOI561	Havens, Warren C	11/05/07	03/23/09	0003223000	0003783622	03/23/09
03/23/99	WPOI562	Havens, Warren C	11/05/07	03/23/09	0003223001	0003783630	03/23/09
03/23/99	WPOI563	Havens, Warren C	11/05/07	03/23/09	0003223002	0003783556	03/23/09
03/23/99	WPOI564	Havens, Warren C	11/05/07	03/23/09	0003223003	0003783617	03/23/09
03/23/99	WPOI565	Havens, Warren C	11/05/07	03/23/09	0003223004	0003783557	03/23/09
03/23/99	WPOI566	Havens, Warren C	11/05/07	03/23/09	0003223005	0003783639	03/23/09
03/23/99	WPOI567	Havens, Warren C	11/05/07	03/23/09	0003223006	0003783645	03/23/09

License Grant Date	Call Sign	Licensee Name	First Construction Deadline	Second Construction Deadline	Extension Request - FCC File Number	Renewal Application - FCC File Number	License Expiration Date
03/23/99	WPOI568	Havens, Warren C	11/05/07	03/23/09	0003223007	0003783558	03/23/09
03/23/99	WPOI569	Havens, Warren C	11/05/07	03/23/09	0003223008	0003783559	03/23/09
03/23/99	WPOI570	Havens, Warren C	11/05/07	03/23/09	0003223009	0003783560	03/23/09
03/23/99	WPOI571	Havens, Warren C	11/05/07	03/23/09	0003223010	0003783561	03/23/09
03/23/99	WPOI572	Havens, Warren C	11/05/07	03/23/09	0003223011	0003783631	03/23/09
03/23/99	WPOI573	Havens, Warren C	11/05/07	03/23/09	0003223012	0003783612	03/23/09
03/23/99	WPOI574	Havens, Warren C	11/05/07	03/23/09	0003223013	0003783562	03/23/09
03/23/99	WPOI575	Havens, Warren C	11/05/07	03/23/09	0003223014	0003783563	03/23/09
03/23/99	WPOI576	Havens, Warren C	11/05/07	03/23/09	0003223015	0003783564	03/23/09
03/23/99	WPOI577	Havens, Warren C	11/05/07	03/23/09	0003223016	0003783604	03/23/09
03/23/99	WPOI578	Havens, Warren C	11/05/07	03/23/09	0003223017	0003783646	03/23/09
03/23/99	WPOI579	Havens, Warren C	11/05/07	03/23/09	0003223018	0003783565	03/23/09
03/23/99	WPOI580	Havens, Warren C	11/05/07	03/23/09	0003223019	0003783566	03/23/09
03/23/99	WPOI581	Havens, Warren C	11/05/07	03/23/09	0003223020	0003783567	03/23/09
03/23/99	WPOI582	Havens, Warren C	11/05/07	03/23/09	0003223021	0003783618	03/23/09
03/23/99	WPOI583	Havens, Warren C	11/05/07	03/23/09	0003223022	0003783632	03/23/09
03/23/99	WPOI584	Havens, Warren C	11/05/07	03/23/09	0003223023	0003783568	03/23/09
03/23/99	WPOI585	Havens, Warren C	11/05/07	03/23/09	0003223024	0003783569	03/23/09
03/23/99	WPOI586	Havens, Warren C	11/05/07	03/23/09	0003223025	0003783570	03/23/09
03/23/99	WPOI587	Havens, Warren C	11/05/07	03/23/09	0003223026	0003783605	03/23/09
03/23/99	WPOI588	Havens, Warren C	11/05/07	03/23/09	0003223027	0003783623	03/23/09
03/23/99	WPOI589	Havens, Warren C	11/05/07	03/23/09	0003223028	0003783653	03/23/09
03/23/99	WPOI590	Havens, Warren C	11/05/07	03/23/09	0003223029	0003783571	03/23/09
03/23/99	WPOI591	Havens, Warren C	11/05/07	03/23/09	0003223030	0003783647	03/23/09
03/23/99	WPOI592	Havens, Warren C	11/05/07	03/23/09	0003223031	0003783572	03/23/09
03/23/99	WPOI593	Havens, Warren C	11/05/07	03/23/09	0003223032	0003783573	03/23/09
03/23/99	WPOI594	Havens, Warren C	11/05/07	03/23/09	0003223033	0003783633	03/23/09
03/23/99	WPOI595	Havens, Warren C	11/05/07	03/23/09	0003223034	0003783574	03/23/09
03/23/99	WPOI596	Havens, Warren C	11/05/07	03/23/09	0003223035	0003783575	03/23/09
03/23/99	WPOI597	Havens, Warren C	11/05/07	03/23/09	0003223036	0003783652	03/23/09
03/23/99	WPOI598	Havens, Warren C	11/05/07	03/23/09	0003223037	0003783576	03/23/09
03/23/99	WPOI599	Havens, Warren C	11/05/07	03/23/09	0003223038	0003783613	03/23/09
03/23/99	WPOI600	Havens, Warren C	11/05/07	03/23/09	0003223039	0003783577	03/23/09
03/23/99	WPOI601	Havens, Warren C	11/05/07	03/23/09	0003223040	0003783578	03/23/09
03/23/99	WPOI602	Havens, Warren C	11/05/07	03/23/09	0003223041	0003783624	03/23/09
03/23/99	WPOI603	Havens, Warren C	11/05/07	03/23/09	0003223042	0003783634	03/23/09
03/23/99	WPOI604	Havens, Warren C	11/05/07	03/23/09	0003223043	0003783579	03/23/09
03/23/99	WPOI605	Havens, Warren C	11/05/07	03/23/09	0003223044	0003783619	03/23/09
03/23/99	WPOI606	Havens, Warren C	11/05/07	03/23/09	0003223045	0003783580	03/23/09
03/23/99	WPOI607	Havens, Warren C	11/05/07	03/23/09	0003223046	0003783606	03/23/09
03/23/99	WPOI608	Havens, Warren C	11/05/07	03/23/09	0003223047	0003783648	03/23/09
03/23/99	WPOI609	Havens, Warren C	11/05/07	03/23/09	0003223048	0003783581	03/23/09
03/23/99	WPOI610	Havens, Warren C	11/05/07	03/23/09	0003223049	0003783582	03/23/09
03/23/99	WPOI611	Havens, Warren C	11/05/07	03/23/09	0003223050	0003783583	03/23/09
03/23/99	WPOI612	Havens, Warren C	11/05/07	03/23/09	0003223051	0003783584	03/23/09
03/23/99	WPOI613	Havens, Warren C	11/05/07	03/23/09	0003223052	0003783635	03/23/09
03/23/99	WPOI614	Havens, Warren C	11/05/07	03/23/09	0003223053	0003783614	03/23/09
03/23/99	WPOI615	Havens, Warren C	11/05/07	03/23/09	0003223054	0003783585	03/23/09
03/23/99	WPOI616	Havens, Warren C	11/05/07	03/23/09	0003223055	0003783586	03/23/09
03/23/99	WPOI617	Havens, Warren C	11/05/07	03/23/09	0003223056	0003783587	03/23/09
03/23/99	WPOI618	Havens, Warren C	11/05/07	03/23/09	0003223057	0003783607	03/23/09
03/23/99	WPOI619	Havens, Warren C	11/05/07	03/23/09	0003223058	0003783649	03/23/09
03/23/99	WPOI620	Havens, Warren C	11/05/07	03/23/09	0003223059	0003783588	03/23/09
03/23/99	WPOI621	Havens, Warren C	11/05/07	03/23/09	0003223060	0003783589	03/23/09

License Grant Date	Call Sign	Licensee Name	First Construction Deadline	Second Construction Deadline	Extension Request - FCC File Number	Renewal Application - FCC File Number	License Expiration Date
03/23/99	WPOI622	Havens, Warren C	11/05/07	03/23/09	0003223061	0003783590	03/23/09
03/22/99	WPOI843	Havens, Warren C	11/05/07	03/22/09	0003223062	0003781371	03/22/09
03/23/99	WPOJ290	Havens, Warren C	11/05/07	03/23/09	0003223063	0003783654	03/23/09
03/23/99	WPOJ291	Havens, Warren C	11/05/07	03/23/09	0003223064	0003783636	03/23/09
03/23/99	WPOJ292	Havens, Warren C	11/05/07	03/23/09	0003223065	0003783591	03/23/09
03/23/99	WPOJ293	Havens, Warren C	11/05/07	03/23/09	0003223066	0003783592	03/23/09
03/23/99	WPOJ294	Havens, Warren C	11/05/07	03/23/09	0003223067	0003783593	03/23/09
03/23/99	WPOJ295	Havens, Warren C	11/05/07	03/23/09	0003223068	0003783608	03/23/09
03/23/99	WPOJ296	Havens, Warren C	11/05/07	03/23/09	0003223069	0003783625	03/23/09
03/23/99	WPOJ297	Havens, Warren C	11/05/07	03/23/09	0003223070	0003783615	03/23/09
03/23/99	WPOJ298	Havens, Warren C	11/05/07	03/23/09	0003223071	0003783594	03/23/09
03/23/99	WPOJ299	Havens, Warren C	11/05/07	03/23/09	0003223072	0003783650	03/23/09
03/23/99	WPOJ300	Havens, Warren C	11/05/07	03/23/09	0003223073	0003783595	03/23/09
03/23/99	WPOJ301	Havens, Warren C	11/05/07	03/23/09	0003223074	0003783596	03/23/09
03/23/99	WPOJ302	Havens, Warren C	11/05/07	03/23/09	0003223075	0003783637	03/23/09
03/23/99	WPOJ303	Havens, Warren C	11/05/07	03/23/09	0003223076	0003783597	03/23/09
03/23/99	WPOJ304	Havens, Warren C	11/05/07	03/23/09	0003223077	0003783638	03/23/09
03/23/99	WPOJ305	Havens, Warren C	11/05/07	03/23/09	0003223078	0003783598	03/23/09
03/23/99	WPOJ306	Havens, Warren C	11/05/07	03/23/09	0003223079	0003783651	03/23/09
10/07/99	WPOK862	Havens, Warren C	11/05/07	10/07/09	0003223118	0003990376	10/07/09
10/07/99	WPOK863	Havens, Warren C	11/05/07	10/07/09	0003223119	0003990345	10/07/09
10/07/99	WPOK864	Havens, Warren C	11/05/07	10/07/09	0003223120	0003990344	10/07/09
10/07/99	WPOK865	Havens, Warren C	11/05/07	10/07/09	0003223121	0003990346	10/07/09
10/07/99	WPOK866	Havens, Warren C	11/05/07	10/07/09	0003223122	0003990347	10/07/09
10/07/99	WPOK867	Havens, Warren C	11/05/07	10/07/09	0003223123	0003990348	10/07/09
10/07/99	WPOK868	Havens, Warren C	11/05/07	10/07/09	0003223124	0003990373	10/07/09
10/07/99	WPOK869	Havens, Warren C	11/05/07	10/07/09	0003223125	0003990349	10/07/09
10/07/99	WPOK871	Havens, Warren C	11/05/07	10/07/09	0003223126	0003990371	10/07/09
10/07/99	WPOK872	Havens, Warren C	11/05/07	10/07/09	0003223127	0003990350	10/07/09
10/07/99	WPOK873	Havens, Warren C	11/05/07	10/07/09	0003223128	0003990369	10/07/09
10/07/99	WPOK874	Havens, Warren C	11/05/07	10/07/09	0003223129	0003990377	10/07/09
10/07/99	WPOK875	Havens, Warren C	11/05/07	10/07/09	0003223130	0003990351	10/07/09
10/07/99	WPOK876	Havens, Warren C	11/05/07	10/07/09	0003223131	0003990352	10/07/09
10/07/99	WPOK877	Havens, Warren C	11/05/07	10/07/09	0003223132	0003990353	10/07/09
10/07/99	WPOK878	Havens, Warren C	11/05/07	10/07/09	0003223133	0003990354	10/07/09
10/07/99	WPOK879	Havens, Warren C	11/05/07	10/07/09	0003223134	0003990374	10/07/09
10/07/99	WPOK880	Havens, Warren C	11/05/07	10/07/09	0003223135	0003990355	10/07/09
10/07/99	WPOK881	Havens, Warren C	11/05/07	10/07/09	0003223136	0003990367	10/07/09
10/07/99	WPOK882	Havens, Warren C	11/05/07	10/07/09	0003223137	0003990356	10/07/09
10/07/99	WPOK883	Havens, Warren C	11/05/07	10/07/09	0003223138	0003990357	10/07/09
10/07/99	WPOK884	Havens, Warren C	11/05/07	10/07/09	0003223139	0003990378	10/07/09
10/07/99	WPOK885	Havens, Warren C	11/05/07	10/07/09	0003223140	0003990358	10/07/09
10/07/99	WPOK886	Havens, Warren C	11/05/07	10/07/09	0003223141	0003990359	10/07/09
10/07/99	WPOK887	Havens, Warren C	11/05/07	10/07/09	0003223142	0003990360	10/07/09
10/07/99	WPOK888	Havens, Warren C	11/05/07	10/07/09	0003223143	0003990375	10/07/09
10/07/99	WPOK889	Havens, Warren C	11/05/07	10/07/09	0003223144	0003990370	10/07/09
10/07/99	WPOK890	Verde Systems LLC	11/05/07	10/07/09	0003223081	0003990428	10/07/09
10/07/99	WPOK891	Verde Systems LLC	11/05/07	10/07/09	0003223082	0003990398	10/07/09
10/07/99	WPOK892	Verde Systems LLC	11/05/07	10/07/09	0003223083	0003990399	10/07/09
10/07/99	WPOK893	Havens, Warren C	11/05/07	10/07/09	0003223145	0003990361	10/07/09
10/07/99	WPOK894	Havens, Warren C	11/05/07	10/07/09	0003223146	0003990362	10/07/09
10/07/99	WPOK895	Havens, Warren C	11/05/07	10/07/09	0003223147	0003990363	10/07/09
10/07/99	WPOK896	Havens, Warren C	11/05/07	10/07/09	0003223148	0003990364	10/07/09
10/07/99	WPOK897	Havens, Warren C	11/05/07	10/07/09	0003223149	0003990379	10/07/09

License Grant Date	Call Sign	Licensee Name	First Construction Deadline	Second Construction Deadline	Extension Request - FCC File Number	Renewal Application - FCC File Number	License Expiration Date
10/07/99	WPOK898	Havens, Warren C	11/05/07	10/07/09	0003223150	0003990368	10/07/09
10/07/99	WPOK899	Havens, Warren C	11/05/07	10/07/09	0003223151	0003990372	10/07/09
10/07/99	WPOK900	Havens, Warren C	11/05/07	10/07/09	0003223152	0003990365	10/07/09
10/07/99	WPOK901	Verde Systems LLC	11/05/07	10/07/09	0003223084	0003990400	10/07/09
10/07/99	WPOK902	Verde Systems LLC	11/05/07	10/07/09	0003223085	0003990401	10/07/09
10/07/99	WPOK903	Verde Systems LLC	11/05/07	10/07/09	0003223086	0003990402	10/07/09
10/07/99	WPOK904	Verde Systems LLC	11/05/07	10/07/09	0003223087	0003990425	10/07/09
10/07/99	WPOK905	Verde Systems LLC	11/05/07	10/07/09	0003223088	0003990403	10/07/09
10/07/99	WPOK906	Verde Systems LLC	11/05/07	10/07/09	0003223089	0003990404	10/07/09
10/07/99	WPOK907	Verde Systems LLC	11/05/07	10/07/09	0003223090	0003990423	10/07/09
10/07/99	WPOK908	Verde Systems LLC	11/05/07	10/07/09	0003223091	0003990429	10/07/09
10/07/99	WPOK909	Verde Systems LLC	11/05/07	10/07/09	0003223092	0003990421	10/07/09
10/07/99	WPOK910	Verde Systems LLC	11/05/07	10/07/09	0003223093	0003990405	10/07/09
10/07/99	WPOK911	Verde Systems LLC	11/05/07	10/07/09	0003223094	0003990406	10/07/09
10/07/99	WPOK912	Verde Systems LLC	11/05/07	10/07/09	0003223095	0003990407	10/07/09
10/07/99	WPOK913	Verde Systems LLC	11/05/07	10/07/09	0003223096	0003990408	10/07/09
10/07/99	WPOK914	Verde Systems LLC	11/05/07	10/07/09	0003223097	0003990426	10/07/09
10/07/99	WPOK915	Verde Systems LLC	11/05/07	10/07/09	0003223098	0003990409	10/07/09
10/07/99	WPOK916	Verde Systems LLC	11/05/07	10/07/09	0003223099	0003990410	10/07/09
10/07/99	WPOK917	Verde Systems LLC	11/05/07	10/07/09	0003223100	0003990411	10/07/09
10/07/99	WPOK918	Verde Systems LLC	11/05/07	10/07/09	0003223101	0003990430	10/07/09
10/07/99	WPOK919	Verde Systems LLC	11/05/07	10/07/09	0003223102	0003990412	10/07/09
10/07/99	WPOK920	Verde Systems LLC	11/05/07	10/07/09	0003223103	0003990413	10/07/09
10/07/99	WPOK921	Verde Systems LLC	11/05/07	10/07/09	0003223104	0003990414	10/07/09
10/07/99	WPOK922	Verde Systems LLC	11/05/07	10/07/09	0003223105	0003990427	10/07/09
10/07/99	WPOK923	Verde Systems LLC	11/05/07	10/07/09	0003223106	0003990415	10/07/09
10/07/99	WPOK924	Verde Systems LLC	11/05/07	10/07/09	0003223107	0003990422	10/07/09
10/07/99	WPOK925	Verde Systems LLC	11/05/07	10/07/09	0003223108	0003990416	10/07/09
10/07/99	WPOK926	Verde Systems LLC	11/05/07	10/07/09	0003223109	0003990417	10/07/09
10/07/99	WPOK928	Verde Systems LLC	11/05/07	10/07/09	0003223110	0003990418	10/07/09
10/07/99	WPOK929	Verde Systems LLC	11/05/07	10/07/09	0003223111	0003990419	10/07/09
10/07/99	WPOK930	Verde Systems LLC	11/05/07	10/07/09	0003223112	0003990431	10/07/09
10/07/99	WPOK931	Verde Systems LLC	11/05/07	10/07/09	0003223113	0003990424	10/07/09
10/07/99	WPOK932	Verde Systems LLC	11/05/07	10/07/09	0003223114	0003990420	10/07/09
10/07/99	WPOK933	Havens, Warren C	11/05/07	10/07/09	0003223153	0003990366	10/07/09
10/26/07	WQHZ577	Skybridge Spectrum Foundation				0003989107	10/07/09
10/26/07	WQHZ578	Skybridge Spectrum Foundation				0003989150	10/07/09
10/24/07	WQHZ579	Skybridge Spectrum Foundation				0003710186	03/23/09
10/24/07	WQHZ580	Skybridge Spectrum Foundation				0003710256	03/23/09
10/24/07	WQHZ581	Skybridge Spectrum Foundation				0003710187	03/23/09
10/24/07	WQHZ582	Skybridge Spectrum Foundation				0003710266	03/23/09
10/24/07	WQHZ583	Skybridge Spectrum Foundation				0003710188	03/23/09
10/24/07	WQHZ584	Skybridge Spectrum Foundation				0003710189	03/23/09
10/24/07	WQHZ585	Skybridge Spectrum Foundation				0003710277	03/23/09
10/24/07	WQHZ586	Skybridge Spectrum Foundation				0003710283	03/23/09
10/24/07	WQHZ587	Skybridge Spectrum Foundation				0003710190	03/23/09
10/24/07	WQHZ588	Skybridge Spectrum Foundation				0003710298	03/23/09
10/24/07	WQHZ589	Skybridge Spectrum Foundation				0003710191	03/23/09
10/24/07	WQHZ590	Skybridge Spectrum Foundation				0003710257	03/23/09
10/24/07	WQHZ591	Skybridge Spectrum Foundation				0003710299	03/23/09
10/24/07	WQHZ592	Skybridge Spectrum Foundation				0003710192	03/23/09
10/24/07	WQHZ593	Skybridge Spectrum Foundation				0003710193	03/23/09
10/24/07	WQHZ594	Skybridge Spectrum Foundation				0003710194	03/23/09
10/24/07	WQHZ595	Skybridge Spectrum Foundation				0003710195	03/23/09

License Grant Date	Call Sign	Licensee Name	First Construction Deadline	Second Construction Deadline	Extension Request - FCC File Number	Renewal Application - FCC File Number	License Expiration Date
10/24/07	WQHZ596	Skybridge Spectrum Foundation				0003710284	03/23/09
10/24/07	WQHZ597	Skybridge Spectrum Foundation				0003710297	03/23/09
10/24/07	WQHZ598	Skybridge Spectrum Foundation				0003710196	03/23/09
10/24/07	WQHZ599	Skybridge Spectrum Foundation				0003710197	03/23/09
10/24/07	WQHZ600	Skybridge Spectrum Foundation				0003710198	03/23/09
10/24/07	WQHZ601	Skybridge Spectrum Foundation				0003710258	03/23/09
10/24/07	WQHZ602	Skybridge Spectrum Foundation				0003710300	03/23/09
10/24/07	WQHZ603	Skybridge Spectrum Foundation				0003710199	03/23/09
10/24/07	WQHZ604	Skybridge Spectrum Foundation				0003710200	03/23/09
10/24/07	WQHZ605	Skybridge Spectrum Foundation				0003710201	03/23/09
10/24/07	WQHZ606	Skybridge Spectrum Foundation				0003710273	03/23/09
10/24/07	WQHZ607	Skybridge Spectrum Foundation				0003710285	03/23/09
10/24/07	WQHZ608	Skybridge Spectrum Foundation				0003710202	03/23/09
10/24/07	WQHZ609	Skybridge Spectrum Foundation				0003710203	03/23/09
10/24/07	WQHZ611	Skybridge Spectrum Foundation				0003710204	03/23/09
10/24/07	WQHZ612	Skybridge Spectrum Foundation				0003710259	03/23/09
10/24/07	WQHZ613	Skybridge Spectrum Foundation				0003710278	03/23/09
10/24/07	WQHZ614	Skybridge Spectrum Foundation				0003710267	03/23/09
10/24/07	WQHZ615	Skybridge Spectrum Foundation				0003710205	03/23/09
10/24/07	WQHZ616	Skybridge Spectrum Foundation				0003710301	03/23/09
10/24/07	WQHZ617	Skybridge Spectrum Foundation				0003710206	03/23/09
10/24/07	WQHZ618	Skybridge Spectrum Foundation				0003710207	03/23/09
10/24/07	WQHZ619	Skybridge Spectrum Foundation				0003710286	03/23/09
10/24/07	WQHZ620	Skybridge Spectrum Foundation				0003710208	03/23/09
10/24/07	WQHZ621	Skybridge Spectrum Foundation				0003710209	03/23/09
10/24/07	WQHZ622	Skybridge Spectrum Foundation				0003710260	03/23/09
10/24/07	WQHZ623	Skybridge Spectrum Foundation				0003710210	03/23/09
10/24/07	WQHZ624	Skybridge Spectrum Foundation				0003710268	03/23/09
10/24/07	WQHZ625	Skybridge Spectrum Foundation				0003710211	03/23/09
10/24/07	WQHZ626	Skybridge Spectrum Foundation				0003710212	03/23/09
10/24/07	WQHZ627	Skybridge Spectrum Foundation				0003710279	03/23/09
10/24/07	WQHZ628	Skybridge Spectrum Foundation				0003710287	03/23/09
10/24/07	WQHZ629	Skybridge Spectrum Foundation				0003710213	03/23/09
10/24/07	WQHZ630	Skybridge Spectrum Foundation				0003710274	03/23/09
10/24/07	WQHZ631	Skybridge Spectrum Foundation				0003710214	03/23/09
10/24/07	WQHZ632	Skybridge Spectrum Foundation				0003710296	03/23/09
10/24/07	WQHZ633	Skybridge Spectrum Foundation				0003710302	03/23/09
10/24/07	WQHZ634	Skybridge Spectrum Foundation				0003710215	03/23/09
10/24/07	WQHZ635	Skybridge Spectrum Foundation				0003710216	03/23/09
10/24/07	WQHZ636	Skybridge Spectrum Foundation				0003710217	03/23/09
10/24/07	WQHZ637	Skybridge Spectrum Foundation				0003710218	03/23/09
10/24/07	WQHZ638	Skybridge Spectrum Foundation				0003710288	03/23/09
10/24/07	WQHZ639	Skybridge Spectrum Foundation				0003710269	03/23/09
10/24/07	WQHZ640	Skybridge Spectrum Foundation				0003710219	03/23/09
10/24/07	WQHZ641	Skybridge Spectrum Foundation				0003710220	03/23/09
10/24/07	WQHZ642	Skybridge Spectrum Foundation				0003710221	03/23/09
10/24/07	WQHZ643	Skybridge Spectrum Foundation				0003710261	03/23/09
10/24/07	WQHZ644	Skybridge Spectrum Foundation				0003710303	03/23/09
10/24/07	WQHZ645	Skybridge Spectrum Foundation				0003710222	03/23/09
10/24/07	WQHZ646	Skybridge Spectrum Foundation				0003710223	03/23/09
10/24/07	WQHZ647	Skybridge Spectrum Foundation				0003710224	03/23/09
10/24/07	WQHZ648	Skybridge Spectrum Foundation				0003710275	03/23/09
10/24/07	WQHZ649	Skybridge Spectrum Foundation				0003710289	03/23/09
10/24/07	WQHZ650	Skybridge Spectrum Foundation				0003710225	03/23/09

License Grant Date	Call Sign	Licensee Name	First Construction Deadline	Second Construction Deadline	Extension Request - FCC File Number	Renewal Application - FCC File Number	License Expiration Date
10/24/07	WQHZ651	Skybridge Spectrum Foundation				0003710226	03/23/09
10/24/07	WQHZ652	Skybridge Spectrum Foundation				0003710227	03/23/09
10/24/07	WQHZ653	Skybridge Spectrum Foundation				0003710262	03/23/09
10/24/07	WQHZ654	Skybridge Spectrum Foundation				0003710280	03/23/09
10/24/07	WQHZ655	Skybridge Spectrum Foundation				0003710310	03/23/09
10/24/07	WQHZ656	Skybridge Spectrum Foundation				0003710228	03/23/09
10/24/07	WQHZ657	Skybridge Spectrum Foundation				0003710304	03/23/09
10/24/07	WQHZ658	Skybridge Spectrum Foundation				0003710229	03/23/09
10/24/07	WQHZ659	Skybridge Spectrum Foundation				0003710230	03/23/09
10/24/07	WQHZ660	Skybridge Spectrum Foundation				0003710290	03/23/09
10/24/07	WQHZ661	Skybridge Spectrum Foundation				0003710231	03/23/09
10/24/07	WQHZ662	Skybridge Spectrum Foundation				0003710232	03/23/09
10/24/07	WQHZ663	Skybridge Spectrum Foundation				0003710309	03/23/09
10/24/07	WQHZ664	Skybridge Spectrum Foundation				0003710233	03/23/09
10/24/07	WQHZ665	Skybridge Spectrum Foundation				0003710270	03/23/09
10/24/07	WQHZ666	Skybridge Spectrum Foundation				0003710234	03/23/09
10/24/07	WQHZ667	Skybridge Spectrum Foundation				0003710235	03/23/09
10/24/07	WQHZ668	Skybridge Spectrum Foundation				0003710281	03/23/09
10/24/07	WQHZ669	Skybridge Spectrum Foundation				0003710291	03/23/09
10/24/07	WQHZ670	Skybridge Spectrum Foundation				0003710236	03/23/09
10/24/07	WQHZ671	Skybridge Spectrum Foundation				0003710276	03/23/09
10/24/07	WQHZ672	Skybridge Spectrum Foundation				0003710237	03/23/09
10/24/07	WQHZ673	Skybridge Spectrum Foundation				0003710263	03/23/09
10/24/07	WQHZ674	Skybridge Spectrum Foundation				0003710305	03/23/09
10/24/07	WQHZ675	Skybridge Spectrum Foundation				0003710238	03/23/09
10/24/07	WQHZ676	Skybridge Spectrum Foundation				0003710239	03/23/09
10/24/07	WQHZ677	Skybridge Spectrum Foundation				0003710240	03/23/09
10/24/07	WQHZ678	Skybridge Spectrum Foundation				0003710241	03/23/09
10/24/07	WQHZ679	Skybridge Spectrum Foundation				0003710292	03/23/09
10/24/07	WQHZ680	Skybridge Spectrum Foundation				0003710271	03/23/09
10/24/07	WQHZ681	Skybridge Spectrum Foundation				0003710242	03/23/09
10/24/07	WQHZ682	Skybridge Spectrum Foundation				0003710243	03/23/09
10/24/07	WQHZ683	Skybridge Spectrum Foundation				0003710244	03/23/09
10/24/07	WQHZ684	Skybridge Spectrum Foundation				0003710264	03/23/09
10/24/07	WQHZ685	Skybridge Spectrum Foundation				0003710306	03/23/09
10/24/07	WQHZ686	Skybridge Spectrum Foundation				0003710245	03/23/09
10/24/07	WQHZ687	Skybridge Spectrum Foundation				0003710246	03/23/09
10/24/07	WQHZ688	Skybridge Spectrum Foundation				0003710247	03/22/09
10/24/07	WQHZ689	Skybridge Spectrum Foundation				0003710311	03/23/09
10/24/07	WQHZ690	Skybridge Spectrum Foundation				0003710293	03/23/09
10/24/07	WQHZ691	Skybridge Spectrum Foundation				0003710248	03/23/09
10/24/07	WQHZ692	Skybridge Spectrum Foundation				0003710249	03/23/09
10/24/07	WQHZ693	Skybridge Spectrum Foundation				0003710250	03/23/09
10/24/07	WQHZ694	Skybridge Spectrum Foundation				0003710265	03/23/09
10/24/07	WQHZ695	Skybridge Spectrum Foundation				0003710282	03/23/09
10/24/07	WQHZ696	Skybridge Spectrum Foundation				0003710272	03/23/09
10/24/07	WQHZ697	Skybridge Spectrum Foundation				0003710251	03/23/09
10/24/07	WQHZ698	Skybridge Spectrum Foundation				0003710307	03/23/09
10/24/07	WQHZ699	Skybridge Spectrum Foundation				0003710252	03/23/09
10/24/07	WQHZ700	Skybridge Spectrum Foundation				0003710253	03/23/09
10/24/07	WQHZ701	Skybridge Spectrum Foundation				0003710294	03/23/09
10/24/07	WQHZ702	Skybridge Spectrum Foundation				0003710254	03/23/09
10/24/07	WQHZ703	Skybridge Spectrum Foundation				0003710295	03/23/09
10/24/07	WQHZ704	Skybridge Spectrum Foundation				0003710255	03/23/09

License Grant Date	Call Sign	Licensee Name	First Construction Deadline	Second Construction Deadline	Extension Request - FCC File Number	Renewal Application - FCC File Number	License Expiration Date
10/24/07	WQHZ705	Skybridge Spectrum Foundation				0003710308	03/23/09
10/24/07	WQHZ706	Skybridge Spectrum Foundation				0003989108	10/07/09
10/24/07	WQHZ707	Skybridge Spectrum Foundation				0003989152	10/07/09
10/24/07	WQHZ708	Skybridge Spectrum Foundation				0003989109	10/07/09
10/24/07	WQHZ709	Skybridge Spectrum Foundation				0003989110	10/07/09
10/24/07	WQHZ710	Skybridge Spectrum Foundation				0003989159	10/07/09
10/24/07	WQHZ711	Skybridge Spectrum Foundation				0003989163	10/07/09
10/24/07	WQHZ712	Skybridge Spectrum Foundation				0003989111	10/07/09
10/24/07	WQHZ713	Skybridge Spectrum Foundation				0003989155	10/07/09
10/24/07	WQHZ714	Skybridge Spectrum Foundation				0003989112	10/07/09
10/24/07	WQHZ715	Skybridge Spectrum Foundation				0003989151	10/07/09
10/24/07	WQHZ716	Skybridge Spectrum Foundation				0003989170	10/07/09
10/24/07	WQHZ717	Skybridge Spectrum Foundation				0003989113	10/07/09
10/24/07	WQHZ718	Skybridge Spectrum Foundation				0003989114	10/07/09
10/24/07	WQHZ719	Skybridge Spectrum Foundation				0003989115	10/07/09
10/24/07	WQHZ720	Skybridge Spectrum Foundation				0003989116	10/07/09
10/24/07	WQHZ721	Skybridge Spectrum Foundation				0003989164	10/07/09
10/24/07	WQHZ722	Skybridge Spectrum Foundation				0003989153	10/07/09
10/24/07	WQHZ723	Skybridge Spectrum Foundation				0003989117	10/07/09
10/24/07	WQHZ724	Skybridge Spectrum Foundation				0003989118	10/07/09
10/24/07	WQHZ725	Skybridge Spectrum Foundation				0003989119	10/07/09
10/24/07	WQHZ726	Skybridge Spectrum Foundation				0003989176	10/07/09
10/24/07	WQHZ727	Skybridge Spectrum Foundation				0003989171	10/07/09
10/24/07	WQHZ728	Skybridge Spectrum Foundation				0003989120	10/07/09
10/24/07	WQHZ729	Skybridge Spectrum Foundation				0003989121	10/07/09
10/24/07	WQHZ730	Skybridge Spectrum Foundation				0003989122	10/07/09
10/24/07	WQHZ731	Skybridge Spectrum Foundation				0003989156	10/07/09
10/24/07	WQHZ732	Skybridge Spectrum Foundation				0003989165	10/07/09
10/24/07	WQHZ733	Skybridge Spectrum Foundation				0003989123	10/07/09
10/24/07	WQHZ734	Skybridge Spectrum Foundation				0003989124	10/07/09
10/24/07	WQHZ735	Skybridge Spectrum Foundation				0003989125	10/07/09
10/24/07	WQHZ736	Skybridge Spectrum Foundation				0003989162	10/07/09
10/24/07	WQHZ737	Skybridge Spectrum Foundation				0003989160	10/07/09
10/24/07	WQHZ738	Skybridge Spectrum Foundation				0003989154	10/07/09
11/01/07	WQHZ739	Skybridge Spectrum Foundation				0003989126	10/07/09
11/01/07	WQHZ740	Skybridge Spectrum Foundation				0003989172	10/07/09
11/01/07	WQHZ741	Skybridge Spectrum Foundation				0003989127	10/07/09
11/01/07	WQHZ742	Skybridge Spectrum Foundation				0003989128	10/07/09
11/01/07	WQHZ743	Skybridge Spectrum Foundation				0003989166	10/07/09
11/01/07	WQHZ744	Skybridge Spectrum Foundation				0003989129	10/07/09
11/01/07	WQHZ745	Skybridge Spectrum Foundation				0003989173	10/07/09
11/01/07	WQHZ746	Skybridge Spectrum Foundation				0003989130	10/07/09
11/01/07	WQHZ747	Skybridge Spectrum Foundation				0003989131	10/07/09
11/01/07	WQHZ748	Skybridge Spectrum Foundation				0003989132	10/07/09
11/01/07	WQHZ749	Skybridge Spectrum Foundation				0003989133	10/07/09
11/01/07	WQHZ750	Skybridge Spectrum Foundation				0003989134	10/07/09
11/01/07	WQHZ751	Skybridge Spectrum Foundation				0003989167	10/07/09
11/01/07	WQHZ752	Skybridge Spectrum Foundation				0003989135	10/07/09
11/01/07	WQHZ753	Skybridge Spectrum Foundation				0003989136	10/07/09
11/01/07	WQHZ754	Skybridge Spectrum Foundation				0003989161	10/07/09
11/01/07	WQHZ755	Skybridge Spectrum Foundation				0003989174	10/07/09
11/01/07	WQHZ756	Skybridge Spectrum Foundation				0003989157	10/07/09
11/01/07	WQHZ757	Skybridge Spectrum Foundation				0003989137	10/07/09
11/01/07	WQHZ758	Skybridge Spectrum Foundation				0003989138	10/07/09

License Grant Date	Call Sign	Licensee Name	First Construction Deadline	Second Construction Deadline	Extension Request - FCC File Number	Renewal Application - FCC File Number	License Expiration Date
11/01/07	WQHZ759	Skybridge Spectrum Foundation				0003989139	10/07/09
11/01/07	WQHZ760	Skybridge Spectrum Foundation				0003989140	10/07/09
11/01/07	WQHZ761	Skybridge Spectrum Foundation				0003989168	10/07/09
11/01/07	WQHZ762	Skybridge Spectrum Foundation				0003989141	10/07/09
11/01/07	WQHZ763	Skybridge Spectrum Foundation				0003989142	10/07/09
11/01/07	WQHZ764	Skybridge Spectrum Foundation				0003989143	10/07/09
11/01/07	WQHZ765	Skybridge Spectrum Foundation				0003989175	10/07/09
11/01/07	WQHZ766	Skybridge Spectrum Foundation				0003989144	10/07/09
11/01/07	WQHZ767	Skybridge Spectrum Foundation				0003989145	10/07/09
11/01/07	WQHZ768	Skybridge Spectrum Foundation				0003989146	10/07/09
11/01/07	WQHZ769	Skybridge Spectrum Foundation				0003989169	10/07/09
11/01/07	WQHZ770	Skybridge Spectrum Foundation				0003989147	10/07/09
11/01/07	WQHZ771	Skybridge Spectrum Foundation				0003989158	10/07/09
11/01/07	WQHZ772	Skybridge Spectrum Foundation				0003989148	10/07/09
11/01/07	WQHZ773	Skybridge Spectrum Foundation				0003989149	10/07/09
10/24/07	WQHZ610	Skybridge Spectrum Foundation					03/23/09