

Connie Diaz

From: Keith Harper
Sent: Thursday, April 23, 2020 2:14 PM
To: David Kaufman
Cc: Charles Mathias; Cecilia Sulhoff; Connie Diaz
Subject: Authorization Granted: 700 MHz Emergency STA Request - NTUA Wireless, LLC
Attachments: Narrative for AT&T STA.pdf; AT&T - Commnet - Letter Agreement (Emergency Consent - Navajo Nation) - FINAL.PDF; Form 601 for AT&T STA.pdf; FCC STA - ATT.pdf

Mr. Kaufman,

The request by NTUA Wireless, LLC for an emergency STA to operate on certain 700 MHz band spectrum in CMA678 (Piute, UT) and CMA319 (Coconino, AZ) within the partition area described by the applicant (licensed to AT&T under call signs WQBQ636, WQJQ792, and WPWV242) is granted via this email. NTUA will be using this spectrum to provide relief during the state-of emergency caused by the spread of COVID-19 throughout the United States. The grant is valid for a period of 60 days.

This STA is authorized on a secondary non-interference basis. NTUA must cease operating on these frequencies if it causes harmful interference to any primary users. Operations under this STA must be consistent with the technical rules applicable to this spectrum. NTUA must cease its operations on this spectrum at the expiration of this STA, or if AT&T withdraws its approval for NTUA's use of this spectrum (whichever comes first). Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA.

Keith D. Harper
Associate Chief, Mobility Division
Wireless Telecommunications Bureau
Federal Communications Commission

Connie Diaz

From: David Kaufman <dkaufman@telecommediatechlaw.com>
Sent: Wednesday, April 22, 2020 5:03 PM
To: Keith Harper
Cc: Charles Mathias; Cecilia Sulhoff; Connie Diaz; Rohan Ranaraja; Douglas Minster; Summers, Brittany; David O'Neil
Subject: NTUA Wireless, LLC Request for 60-day Emergency STA to Serve the Navajo Nation (AT&T's 700 MHz Spectrum)
Attachments: FCC STA - ATT.pdf; Form 601 for AT&T STA.pdf; Narrative for AT&T STA.pdf; AT&T - Commnet - Letter Agreement (Emergency Consent - Navajo Nation) - FINAL.PDF

Mr. Harper:

As always, thanks in advance for your assistance in ameliorating the issues created by the COVID-19 virus in the Navajo Nation.

Attached please find a new Form 601 application for emergency STA on behalf of NTUA Wireless, LLC ("NTUAW"). The application seeks temporary, 60-day emergency authority to operate in portions of the Navajo Nation in the states of Arizona and Utah, using spectrum licensed to AT&T under three AT&T call signs. This application is precipitated by the extraordinary circumstances pertaining within the reservation due to the crisis created by the COVID-19 virus.

Also attached as exhibits to that Form 601 are: 1) a narrative exhibit explaining the justification for the request, and seeking waiver of the requirement for electronic filing in ULS; 2) a letter agreement between NTUAW's parent, Commnet Wireless, LLC, and AT&T, whereby AT&T consents to the grant of this STA; and 3) a pdf map of the proposed STA service area.

The paper original of this STA and its exhibits is being sent to the Commission's offices in Annapolis Junction, Maryland, scheduled for arrival on Friday, April 24, 2020. However, consistent with the Commission's guidance on the processing of emergency STA requests related to the COVID-19 virus, we respectfully ask that the Commission begin processing this application immediately, based upon the material contained in this email.

Please direct any questions to the undersigned; you may call me at 202-997-0025. Please copy AT&T's counsel, Brittany Summers, on email correspondence; she is copied on this email.

David J. Kaufman
Rini O'Neil, PC
1200 New Hampshire Ave. NW
Suite 600
Washington, DC 20036
202-955-5516 office
202-997-0025 cell

The information contained in this message, including attachments, may contain privileged or confidential information that is intended to be delivered only to the person identified above. If you are not the intended recipient, or the person responsible for delivering this message to the intended recipient, we request that you immediately notify the sender and ask that you do not read the message or its attachments, and that you delete them without copying or sending them to anyone else.

**NTUA Wireless, LLC
Request for Emergency
Special Temporary Authority
Use of 700 MHz Spectrum
Licensed to AT&T**

**DESCRIPTION OF REQUEST; REASON FOR
EMERGENCY TREATMENT**

NTUA Wireless, LLC (“NTUAW”) hereby requests an emergency Special Temporary Authority (“STA”) to operate for sixty (60) days using 700 MHz spectrum licensed to subsidiaries of AT&T under call signs WPWV242, WQJQ792 and WQBQ636, in portions of Coconino County, AZ, Kane County, UT and San Juan County, UT. NTUAW needs this spectrum on an emergency basis as part of its effort to ameliorate the material adverse effects of the COVID-19 virus on the residents and businesses within the Navajo Nation reservation.

Attached to this STA request are the following:

- a copy of the letter agreement between NTUAW’s parent, Commnet Wireless, LLC,¹ and AT&T, containing AT&T’s consent to the filing and grant of this STA; and
- a pdf map of the proposed STA service area (reflecting the “connect-the-dots” coordinates set forth in the letter agreement).

Justification for Emergency Processing

The fight nationwide against the COVID-19 disease continues across the United States. Americans have been told to shelter in place, to wash their hands often, and to do as many activities as feasible remotely, using the internet rather than in-person encounters. Doing so is often not possible on portions of the Navajo Nation reservation, which covers part of Arizona, New Mexico and Utah, with a total area approximately the size of the state of West Virginia. Many Nation residents have no running water, but must truck potable water to their homes. Many have no reliable internet. Many live miles from the closest town or medical facility.

Indeed, the Navajo Nation has been particularly hard hit by the virus, and is struggling to meet the needs of its residents. United Press International reported that: “The reservation remains a hot spot for the pandemic, measuring 10 times the number of confirmed cases per capita as the state of Arizona, according to state’s health department figures.”²

Recent news reports have documented the crisis which the Navajo Nation is currently enduring. *See, e.g.,* <https://www.npr.org/2020/04/22/839948923/navajo-families-without-internet-struggle-to-homeschool-during-covid-19-pandemic%20last%20viewed%20April%2022>

¹ NTUAW is owned 49% and managed by Commnet; NTUAW is owned 51% by the Navajo Tribal Utility Authority, an instrumentality of the Navajo Nation government. Commnet, in turn, is a wholly-owned subsidiary of ATN International, Inc., a publicly-traded company.

² https://www.upi.com/Top_News/US/2020/04/22/Navajo-Nation-extends-shelter-in-place-order-for-COVID-19-outbreak/1741587499687/ last viewed on April 22, 2020 at 1:08 pm EDT.

last viewed April 22, 2020 at 1:11 pm EDT; <https://www.nbcnews.com/news/us-news/coronavirus-hits-indian-country-hard-exposing-infrastructure-disparities-n1186976> last viewed April 21, 2020 at 4:37 pm; <https://www.washingtonpost.com/climate-environment/2020/04/04/native-american-coronavirus/>, last viewed on April 8, 2020 at 1:10 pm EDT; https://www.washingtonpost.com/health/number-of-coronavirus-cases-rises-17percent-on-navajo-reservation/2020/04/11/2f9787c8-7c62-11ea-a311-adb1344719a9_story.html, last viewed on April 17, 2020 at 10:34 am EDT.

As discussed in these various reports, the residents of the Navajo Nation do not have adequate internet service, at least in the more remote portions of the reservation. Many lack running water to wash their hands. They are often in an at-risk category. And the disease is rampant on the reservation. If they are to be able to social distance, they absolutely need additional broadband capacity, which this STA will help provide.

As the Commission is aware, NTUAW has been a leader in bringing quality wireless services to the Navajo Nation for a number of years. NTUAW holds certain spectrum lease authority in its own name, and also operates all of the other ATN-licensed facilities within the Navajo Nation, operating primarily in the 600 MHz, cellular, 700 MHz, AWS and broadband PCS bands. However, given that the Navajo Nation is approximately the same size as the state of West Virginia, there are numerous gaps in the ATN/NTUAW coverage areas, as well as areas where coverage is bandwidth-limited, and therefore capacity-limited.

Request for Waiver of Electronic Filing Requirement

Under Section 1.931 of the Commission's Rules, STA requests such as this are supposed to be filed electronically in ULS. However, ULS does not support the filing of an emergency STA request for geographically-licensed spectrum (such as the instant 700 MHz spectrum). Moreover, the Commission has issued guidance advising emergency STA applicants due to the COVID-19 emergency to file STA requests initially via email to Commission staff, followed up by a paper Form 601 application. *See* FCC, WTB Special Temporary Authority and Waiver Request Filing Guide (last visited April 20, 2020).

Therefore, NTUAW herein seeks leave to file the STA request initially via email, followed up by a paper Form 601 filing.

LETTER AGREEMENT

This Letter Agreement (this “Agreement”) is entered into as of this 22nd day of April, 2020 (the “Effective Date”), by and between AT&T Services, Inc. on behalf of itself and its affiliates (“AT&T”) and Commnet Wireless, LLC, on behalf of itself and its subsidiaries (collectively, “Commnet”).

1. This Agreement is entered into to enable Commnet to provide certain services as part of its COVID-19 emergency response measures.

2. Commnet plans to seek Special Temporary Authority (“STA”) to operate on certain frequencies licensed to AT&T in the Lower 700 MHz band in Coconino, Arizona and San Juan, Utah as specified in Attachment 1 (the “Spectrum”).

3. Subject to the conditions below, AT&T hereby consents to Commnet’s use of the Spectrum in accordance with the STA.

Conditions

- Commnet shall use the Spectrum exclusively as part of Commnet’s COVID-19 emergency response measures;
- Commnet shall timely provide AT&T, upon request, information regarding its COVID-19 emergency response measures as such measures pertain to the use of the Spectrum;
- Commnet shall not make any further use of the Spectrum after the expiration of the STA;
- Commnet shall be solely responsible for using the Spectrum in accordance with all applicable laws, including the Communications Act of 1934, as amended, and the rules, regulations, orders, decisions and written policies of the Federal Communications Commission (the “FCC”), as well as any conditions imposed by the FCC in connection with the STA;
- Commnet shall submit any applications needed to obtain the STA; and
- Commnet agrees to indemnify AT&T for any claim, damages, fines or losses that arise from Commnet’s use of the spectrum.

[Signature Pages Follow]

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed on the day and year first above written.

AT&T Services, Inc.

By: 
Name: Thomas Lowe
Its: Managing Director, Corporate Development

Commnet Wireless, LLC

By: _____
Name: _____
Its: _____

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed on the day and year first above written.

AT&T Services, Inc.

By: _____
Name: Thomas Lowe
Its: Managing Director, Corporate Development

Commnet Wireless, LLC

By:  _____
Name: Roderick Nelson
Its: CEO

ATTACHMENT 1

For purposes of the Agreement, "Spectrum" means frequencies in the Lower 700 MHz licenses (i) WPWV242 within the area described by connecting the Set 1 coordinates (as listed below) in the area of Coconino, Arizona and (ii) WQJQ792 and WQBQ636 within the area described by connecting the Set 2 coordinates (as listed below) in the area of San Juan, Utah.

Set 1 (Coconino, Arizona)

1|36|59|35.6|-110|45|43.4
2|36|59|45.1|-111|42|15.0
3|36|31|03.4|-111|56|05.3
4|36|15|17.5|-111|44|47.0
5|35|58|34.8|-111|40|41.4
6|35|37|08.3|-111|42|15.0
7|35|30|59.4|-111|49|39.4
8|35|19|00.4|-111|37|10.9
9|35|06|14.2|-110|58|23.6
10|35|05|17.5|-110|45|43.4
11|36|59|35.6|-110|45|43.4

Set 2 (San Juan, Utah)

1|37|20|38.6|-109|03|29.9
2|37|26|12.3|-109|22|51.6
3|37|15|59.1|-109|51|26.0
4|37|11|37.6|-110|18|07.7
5|37|17|20.3|-110|46|53.4
6|37|04|51.8|-110|58|55.3
7|37|01|15.4|-111|13|57.6
8|37|09|58.4|-111|25|48.2
9|37|06|49.0|-111|40|05.4
10|37|00|21.3|-111|42|32.0
11|37|00|12.2|-109|14|01.5
12|37|06|13.0|-109|04|15.0
13|37|20|38.6|-109|03|29.9

FCC Application for Radio Service Authorization:
 Wireless Telecommunications Bureau
 Public Safety and Homeland Security Bureau

1) Radio Service Code: WY	1a) Existing Radio Service Code:
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General Information

2) (Select only one) (NE) NE - New MD - Modification AM - Amendment RO - Renewal Only RM - Renewal/Modification CA - Cancellation of License AU - Administrative Update WD - Withdrawal of Application DU - Duplicate License NT - Required Notifications EX - Requests for Extension of Time RL - Registered Location/Link	
3a) If this application is for a Developmental License, Demonstration License, or a Special Temporary Authorization (STA), enter the code and attach the required exhibit as described in the instructions. Otherwise enter 'N/A' (Not Applicable).	(S) D M S N/A
3b) If this application is for Special Temporary Authority due to an emergency situation, enter 'Y'; otherwise enter 'N'. Refer to Rule 1.915 for an explanation of situations considered to be an emergency.	(Y) Yes No
4) If this application is for an Amendment or Withdrawal, enter the file number of the pending application currently on file with the FCC.	File Number
5) If this application is for a Modification, Renewal Only, Renewal/Modification, Cancellation of License, Duplicate License, or Administrative Update, enter the call sign of the existing FCC license. If this is a request for Registered Location/Link, enter the FCC call sign assigned to the geographic license.	Call Sign
6) If this application is for a New, Amendment, Renewal Only, or Renewal/Modification, enter the requested authorization expiration date (this item is optional).	60 DAYS FROM GRANT MM DD
7) Is this application "major" as defined in § 1.929 of the Commission's Rules when read in conjunction with the applicable radio service rules found in Parts 22 and 90 of the Commission's Rules? (NOTE: This question only applies to certain site-specific applications. See the instructions for applicability and full text of § 1.929).	(N) Yes No
8) Are attachments (other than associated schedules) being filed with this application?	(Y) Yes No

Fees, Waivers, and Exemptions

9) Is the Applicant exempt from FCC application fees?	(N) Yes No
10) Is the Applicant exempt from FCC regulatory fees?	(N) Yes No
11a) Does this application include a request for a Waiver of the Commission's Rule(s)? If 'Yes', attach an exhibit providing rule number(s) and explaining circumstances.	(Y) Yes No
11b) If 11a is 'Y', and a feeable waiver request is attached, enter the number of rule sections involved. NOT A FEEABLE WAIVER	Number of Rule Section(s): 0
12) Are the frequencies or parameters requested in this filing covered by grandfathered privileges, previously approved by waiver, or functionally integrated with an existing station?	(N) Yes No

Applicant Information

13) FCC Registration Number (FRN): 0020444741			
14) Applicant/Licensee Legal Entity Type: (Select One) <input type="checkbox"/> Individual <input type="checkbox"/> Unincorporated Association <input type="checkbox"/> Trust <input type="checkbox"/> Government Entity <input type="checkbox"/> Corporation <input checked="" type="checkbox"/> Limited Liability Company <input type="checkbox"/> General Partnership <input type="checkbox"/> Limited Partnership <input type="checkbox"/> Limited Liability Partnership <input type="checkbox"/> Consortium <input type="checkbox"/> Other: _____			
15) If the Licensee name is being updated, is the update a result from the sale (or transfer of control) of the license(s) to another party and for which proper Commission approval has not been received or proper notification not provided?			(N) Yes No
16) First Name (if individual):	MI:	Last Name:	Suffix:
17) Legal Entity Name (if other than individual): NTUA WIRELESS, LLC			
18) Attention To: ROHAN RANARAJA			
19) P.O. Box:	And/Or	20) Street Address: 1001 TECHNOLOGY DRIVE	
21) City: LITTLE ROCK	22) State: AR	23) Zip Code: 72223	
24) Telephone Number: 501-448-1249		25) Fax:	
26) E-Mail Address: RRANARAJA@ATNI.COM			

27) Demographics (Optional)

Race: <input type="checkbox"/> American Indian or Alaska Native <input type="checkbox"/> Asian <input type="checkbox"/> Black or African-American <input type="checkbox"/> Native Hawaiian or Other Pacific Islander <input type="checkbox"/> White	Ethnicity: <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Not Hispanic or Latino	Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female
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Real Party in Interest

28) Name of Real Party in Interest of Applicant (If different from Applicant):	29) FCC Registration Number (FRN) of Real Party in Interest:
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Contact Information (If different from the Applicant)

Check here if same as Applicant.

30) First Name: DAVID	MI: J	Last Name: KAUFMAN	Suffix:
31) Company Name: RINI O'NEIL, PC			
32) Attention To:			
33) P.O. Box:	And /Or	34) Street Address: 1200 NEW HAMPSHIRE AVE. NW, #600	
35) City: WASHINGTON	36) State: DC	37) Zip Code: 20036	
38) Telephone Number: 202-997-0025		39) Fax:	
40) E-Mail Address: DKAUFMAN@RINIONEIL.COM			

Regulatory Status

41) This filing is for authorization to provide or use the following type(s) of radio service offering (enter all that apply): (<input checked="" type="checkbox"/>) Common Carrier (<input type="checkbox"/>) Non-Common Carrier (<input type="checkbox"/>) Private, internal communications (<input type="checkbox"/>) Broadcast Services (<input type="checkbox"/>) Band Manager
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Type of Radio Service

42) This filing is for authorization to provide the following type(s) of radio service (choose all that apply): (<input checked="" type="checkbox"/>) Fixed (<input checked="" type="checkbox"/>) Mobile (<input type="checkbox"/>) Radiolocation (<input type="checkbox"/>) Satellite (sound) (<input type="checkbox"/>) Broadcast Services
43) Does the Applicant propose to provide service interconnected to the public telephone network? (<input checked="" type="checkbox"/>) Yes <input type="checkbox"/> No

Alien Ownership Questions (If any answer is "Y", provide an attachment explaining the circumstances. In preparing the attachment, refer to the Main Form Instructions for the "Alien Ownership Questions".)

44) Is the Applicant a foreign government or the representative of any foreign government? (<input checked="" type="checkbox"/>) Yes <input type="checkbox"/> No
45) Is the Applicant an alien or the representative of an alien? (<input checked="" type="checkbox"/>) Yes <input type="checkbox"/> No
46) Is the Applicant a corporation organized under the laws of any foreign government? (<input checked="" type="checkbox"/>) Yes <input type="checkbox"/> No
47) Is the Applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country? (<input checked="" type="checkbox"/>) Yes <input type="checkbox"/> No

48a) Is the Applicant directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens or their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country?

(N) Yes No

48b) If the answer to 47 or 48a is 'Y' select one of the choices below.

The Applicant is exempt from the provisions of Section 310(b).

If it is not necessary to file a petition for declaratory ruling if the Applicant includes in the attachment required by Item 47 or Item 48a a showing that the requested license(s) is exempt from the provisions of Section 310(b).

The Applicant has received a declaratory ruling(s) approving its foreign ownership, and the application involves only the acquisition of additional spectrum for the provision of a wireless service in a geographic coverage area for which the Applicant has been previously authorized.

If checked, include in the attachment required by Item 47 or Item 48a the citation(s) of the applicable declaratory ruling(s) by DA/FCC number, the FCC Record citation, if available, release date, and a statement that there has been no change in the foreign ownership of the Applicant since the issuance of its ruling.

The Applicant: (i) has received a declaratory ruling(s) approving its foreign ownership, but is not able to make the certification specified immediately above; or (ii) is an "affiliate" of a Licensee or Lessee/Sublessee that received a declaratory ruling(s) under 47 CFR § 1.990(a) and is relying on the affiliate's ruling for purposes of filing this application as permitted under the affiliate's ruling and 47 CFR § 1.994(b).

If checked, and if the Applicant received its declaratory ruling(s) on or after August 9, 2013, include in the attachment required by Item 47 or Item 48a the citation(s) of the Applicant's declaratory ruling(s) by DA/FCC number, the FCC Record citation, if available, release date, and a statement that the Applicant is in compliance with the terms and conditions of its ruling and with the Commission's Rules.

If checked, and if the Applicant received its declaratory ruling(s) prior to August 9, 2013, include in the attachment required by Item 48a a copy of a petition for declaratory ruling filed contemporaneously with the Commission to extend the Applicant's existing ruling(s) to cover the same radio service(s) and geographic coverage area(s) involved in the application. Alternatively, the Applicant may request a new declaratory ruling pursuant to Section 1.990(a) of the Commission's Rules, 47 CFR § 1.990(a). Petitions for declaratory ruling may be filed electronically on the Internet through the International Bureau Filing System (IBFS) (with a copy attached hereto).

If checked, and if the Applicant is relying on an affiliate's ruling for purposes of filing this application, include in the attachment required by Item 47 or Item 48a the citation(s) of the applicable declaratory ruling(s) by DA/FCC number, the FCC Record citation, if available, release date, and a statement that the Applicant is in compliance with the terms and conditions of the named affiliate's ruling and with the Commission's Rules. The Applicant must also include a certification of compliance signed by the named affiliate or other qualified entity as specified in 47 CFR § 1.994(b). See Main Form Instructions for Items 47 or 48a, as applicable.

The Applicant has not received a declaratory ruling approving its foreign ownership and is requesting a declaratory ruling under 47 CFR § 1.990(a) in a petition filed contemporaneously with the Commission.

If checked, include in the attachment required by Item 47 or 48a a copy of the petition for declaratory ruling filed contemporaneously with the Commission pursuant to 47 CFR § 1.990(a). Petitions for declaratory ruling may be filed electronically on the Internet through the International Bureau Filing System (IBFS) (with a copy attached hereto).

Basic Qualification Questions

49) Has the Applicant or any party to this application had any FCC station authorization, license or construction permit revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission?	(<input checked="" type="radio"/>) Yes <input type="radio"/> No
50) Has the Applicant or any party to this application, or any party directly or indirectly controlling the Applicant, ever been convicted of a felony by any state or federal court?	(<input checked="" type="radio"/>) Yes <input type="radio"/> No
51) Has any court finally adjudged the Applicant or any party directly or indirectly controlling the Applicant guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement, or any other means or unfair methods of competition?	(<input checked="" type="radio"/>) Yes <input type="radio"/> No
If the answer to any of 49-51 is 'Y', attach an exhibit explaining the circumstances.	

Aeronautical Advisory Station (Unicom) Certification

52) (<input type="checkbox"/>) I certify that the station will be located on property of the airport to be served, and, in cases where the airport does not have a control tower, RCO, or FAA flight service station, that I have notified the owner of the airport and all aviation service organizations located at the airport within ten days prior to application.

Broadband Radio Service and Educational Broadband Service Cable Cross-Ownership

53a) Will the requested facilities be used to provide multichannel video programming service?	(<input type="checkbox"/>) Yes <input type="radio"/> No
53b) If the answer to question 53a is 'Y', does the Applicant operate, control or have an attributable interest (as defined in 47 CFR § 27.1202) in a cable television system whose franchise area is located within the geographic service area of the requested facilities?	(<input type="checkbox"/>) Yes <input type="radio"/> No
Note: If the answer to question 53b is 'Y', attach an exhibit explaining how the Applicant complies with 47 CFR § 27.1202 or justifying a waiver of that rule. If a waiver of the Commission Rule(s) is being requested, Item 11a must be answered 'Y'.	

Broadband Radio Service and Educational Broadband Service (Part 27)

54) (For EBS only) Does the Applicant comply with the programming requirements contained in 47 CFR § 27.1203?	(<input type="checkbox"/>) Yes <input type="radio"/> No
Note: If the answer to item 54 is 'N', attach an exhibit explaining how the Applicant complies with 47 CFR § 27.1203 of the Commission's Rules or justifying a waiver of that rule. If a waiver of the Commission Rule(s) is being requested, Item 11a must be answered 'Y'.	
55) (For BRS and EBS) Does the Applicant comply with 47 CFR §§ 27.50, 27.55, and 27.1221?	(<input type="checkbox"/>) Yes <input type="radio"/> No
Note: If the answer to item 55 is 'N', attach an exhibit justifying a waiver of that rule(s). If a waiver of the Commission Rule(s) is being requested, Item 11a must be answered 'Y'.	

For Applicants Who Participated in an Auction

56) Is the Applicant a qualifying rural wireless partnership or a member of a qualifying rural wireless partnership?	(<input type="checkbox"/>) Yes <input type="radio"/> No
Note: If the answer to item 56 is 'Y', attach an exhibit listing all members of the qualifying rural wireless partnership, including their FRN numbers.	

General Certification Statements

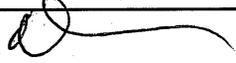
1) The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application.
2) The Applicant certifies that grant of this application would not cause the Applicant to be in violation of any pertinent cross-ownership or attribution rules.* *If the Applicant has sought a waiver of any such rule in connection with this application, it may make this certification subject to the outcome of the waiver request.
3) The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.
4) The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to § 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under § 1.2002(c) of the rules, 47 CFR § 1.2002(c). See 47 CFR § 1.2002(b) for the definition of "party to the application" as used in this certification.
5) The Applicant certifies that it either (1) has current required ownership data on file with the Commission, (2) is filing updated ownership data simultaneously with this application, or (3) is not required to file ownership data under the Commission's Rules.
6) The Applicant certifies that the facilities, operations, and transmitters for which this authorization is hereby requested are either: (1) categorically excluded from routine environmental evaluation for RF exposure as set forth in 47 CFR § 1.1307(b); or, (2) have been found not to cause human exposure to levels of radiofrequency radiation in excess of the limits specified in 47 CFR §§ 1.1310 and 2.1093; or, (3) are the subject of one or more Environmental Assessments filed with the Commission.
7) The Applicant certifies that it has reviewed the appropriate Commission Rules defining eligibility to hold the requested license(s), and is eligible to hold the requested license(s).
8) The Applicant certifies that it is not in default on any payment for Commission licenses and that it is not delinquent on any non-tax debt owed to any federal agency.
9) The Applicant certifies that the Applicant and all of the related individuals and entities required to be disclosed on this application and FCC Form 602 (FCC Ownership Disclosure Information for the Wireless Telecommunications Services) are not person(s) who have been, for reasons of national security, barred by any agency of the Federal Government from bidding on a contract, participating in an auction, or receiving a grant. This certification applies only to applications for licenses for spectrum that is required by Sections 6103, 6401-6403 of the Middle Class Tax Relief and Job Creation Act of 2012, codified at 47 U.S.C. §§ 309, 1413, 1451-1452, to be assigned by a system of competitive bidding under 47 U.S.C. § 309(j).

Signature

57) Typed or Printed Name of Party Authorized to Sign

First Name: ROHAN	MI:	Last Name: RANARAJA	Suffix:
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58) Title: EXEC. DIR., REGULATORY

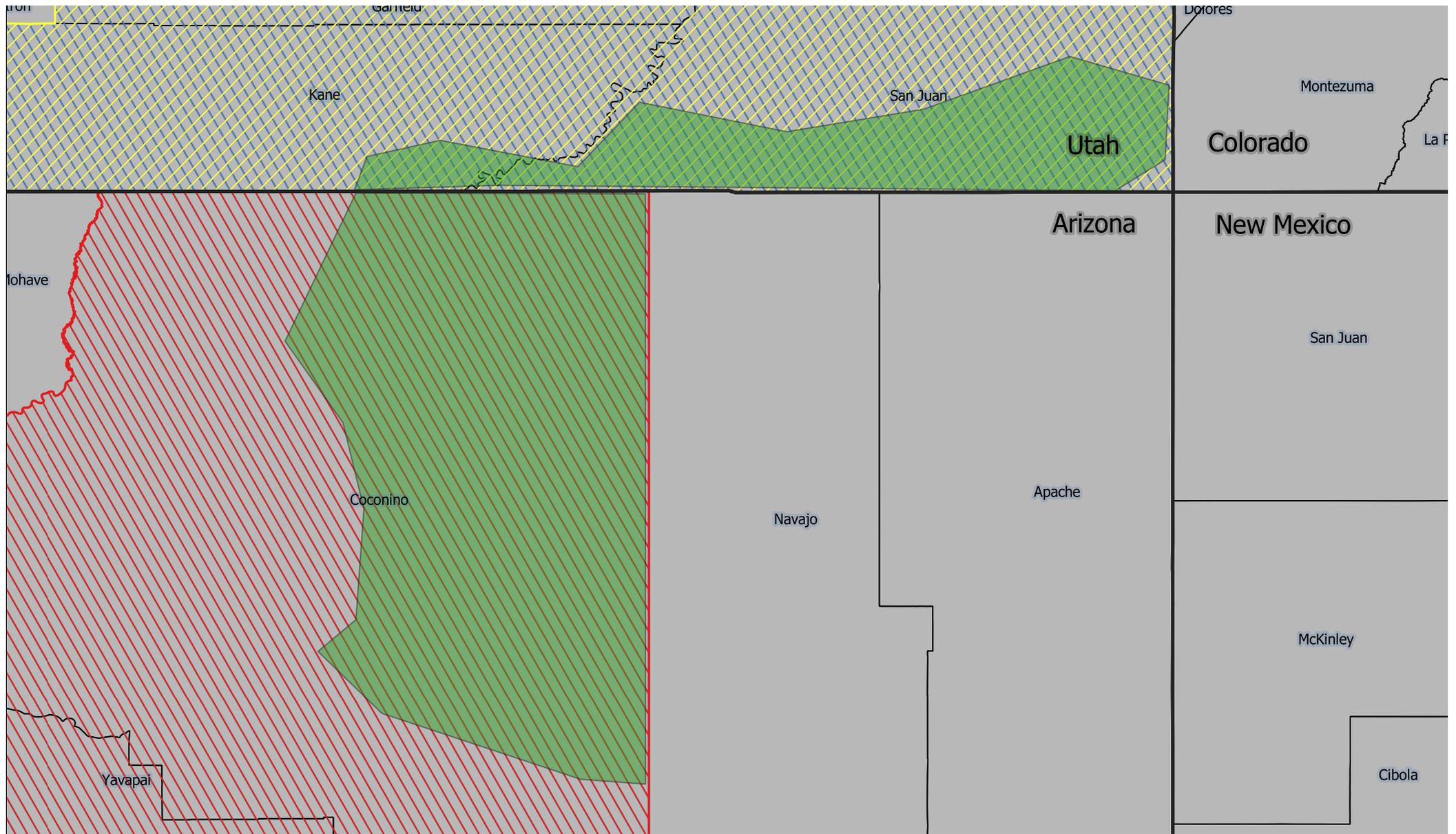
Signature: 	59) Date:
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FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID.

Upon grant of this license application, the Licensee may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in termination of the license. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of license requested in this application.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, § 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, § 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, § 503).

Navajo Nation; 700 STA Partition; 2020-04-21



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700MHz STA Area WQBQ636
tl_2018_us_state WPWV242
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