

## Connie Diaz

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**From:** Elizabeth Fishel  
**Sent:** Monday, May 11, 2020 4:34 PM  
**To:** Blaise Scinto; Paul Malmud; Stephen Buenzow (CTR); John Schauble; Sharkey, Steve; Kung, Angela; Fox, Russell; Wieczorek, Christopher; Sommer Gilbert; Susan Mickley  
**Cc:** FCC Operations Center; Dana Shaffer; Donald Stockdale; Connie Diaz; Cecilia Sulhoff; Sean Spivey; Kari Hicks  
**Subject:** FW: T-Mobile -- 600 MHz STA Request  
**Attachments:** Form 601 -- 600 MHz STA Request - Comcast (As-Filed) 5.11.20.pdf

Good afternoon,

Shown below is the emergency STA issued by the Broadband to permit T-Mobile License LLC to use WT spectrum in PEA001 and PEA020.

Please contact me if you have any questions.

Elizabeth (Beth) Fishel

T-Mobile License LLC's request for an emergency STA to operate on the WT (600 MHz) spectrum associated with CC Wireless Investment, LLC's (Comcast Corporation) WT stations WQZM759 (PEA020) and WQZM761 (PEA001) has been granted until June 30, 2020. T-Mobile License LLC must cease its operations on these 600 MHz channels if CC Wireless Investment, LLC withdraws its approval for T-Mobile License LLC to use this spectrum at any time. T-Mobile License LLC will be using this spectrum to provide relief during the state-of emergency caused by the spread of the coronavirus throughout the United States.

This STA is authorized on a secondary non-interference basis. T-Mobile License LLC must cease operating on these frequencies if it causes harmful interference to any primary users. 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.

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**From:** Kung, Angela <AYKung@mintz.com>  
**Sent:** Monday, May 11, 2020 3:11 PM  
**To:** Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>; Blaise Scinto <Blaise.Scinto@fcc.gov>; Paul Malmud <Paul.Malmud@fcc.gov>; Peter Daronco <Peter.Daronco@fcc.gov>; John Schauble <John.Schauble@fcc.gov>; Susan Mickley <Susan.Mickley@fcc.gov>; Sommer Gilbert <Sommer.Gilbert@fcc.gov>; Stephen Buenzow (CTR) <Stephen.Buenzow.CTR@fcc.gov>; Charles Mathias <Charles.Mathias@fcc.gov>; Dana Shaffer <dana.shaffer@fcc.gov>; Donald Stockdale <Donald.Stockdale@fcc.gov>; Kari Hicks <Kari.Hicks@fcc.gov>; Sean Spivey <Sean.Spivey@fcc.gov>; Connie Diaz <Connie.Diaz@fcc.gov>; Cecilia Sulhoff <Cecilia.Sulhoff@fcc.gov>; ULScc <ULScc@fcc.gov>  
**Cc:** Sharkey, Steve <Steve.Sharkey@T-Mobile.com>; Wieczorek, Christopher <Chris.Wieczorek@T-Mobile.com>; Fox, Russell <RFox@mintz.com>  
**Subject:** T-Mobile -- 600 MHz STA Request

Good afternoon:

Attached please find a copy of an emergency request for special temporary authority submitted on behalf of our client, T-Mobile USA, Inc. for 600 MHz spectrum licensed to Comcast Corporation (through its subsidiary CC Wireless Investment,

LLC), along with a copy of the consent. Consistent with the Wireless Bureau's recent guidance on the electronic filing of STA requests, we submitted the attached STA request, including FCC Form 601, in INBOX – 1.931.

If you have any questions, please let us know.

Thanks,

**Angela Kung**  
*Of Counsel*

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004  
+1.202.434.7320  
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601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

May 11, 2020

**Via ECFS**

Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC, 20554

**Re: Emergency Request for Special Temporary Authority  
Docket INBOX – 1.931, Market-Based STAs**

Dear Mr. Stockdale:

T-Mobile USA, Inc. (“T-Mobile”),<sup>1/</sup> on behalf of its subsidiary, T-Mobile License, LLC and pursuant to Section 1.931 of the Commission’s rules and the guidance recently released by the Wireless Telecommunications Bureau (“Bureau”),<sup>2/</sup> hereby requests emergency special temporary authority (“STA”) to use spectrum in the 600 MHz band for which it is not licensed. T-Mobile will use this spectrum to provide enhanced wireless broadband services until June 30, 2020 to help keep Americans connected during the ongoing novel coronavirus pandemic. T-Mobile seeks Commission action as part of its Keep Americans Connected Pledge to help citizens overcome current challenges that have required them to remain socially distant.<sup>3/</sup>

***STA is in the Public Interest***

On March 13, 2020, T-Mobile submitted the first requests of their kind to increase its network capacity during the current crisis, explaining that grant of its request would help keep Americans connected during the COVID-19 pandemic. Among others, T-Mobile submitted an emergency

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<sup>1/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>2/</sup> See 47 C.F.R. § 1.931(a)(2)(iv); *Electronic Filing Now Available for All License Applications in the Wireless Radio Services*, Public Notice, DA 20-463 (rel. Apr. 29, 2020).

<sup>3/</sup> See News Release, *Chairman Pai Launches the Keep Americans Connected Pledge*, FCC (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>; News Release, *Chairman Pai Extends Keep Americans Connected Pledge Through End of June Due to Ongoing COVID-19 Pandemic*, FCC (Apr. 30, 2020) (“*Keep Americans Connected Pledge Extension*”), <https://docs.fcc.gov/public/attachments/DOC-364090A1.pdf>.

request for STA, for a period of 60 days from Commission action, to use 600 MHz band spectrum licensed to Comcast Corporation (“Comcast”) through its subsidiary CC Wireless Investment, LLC.<sup>4/</sup> The Commission quickly granted T-Mobile’s request, noting that its action was part of Chairman Pai’s initiative, in partnership with the private sector, to keep Americans connected during the coronavirus outbreak.<sup>5/</sup> As the Commission’s News Release stated, Chairman Pai said that he “would like to thank T-Mobile for launching this effort. This temporary authority will help T-Mobile better serve customers who, like all of us, are making significant adjustments to their daily lives to minimize in-person interactions and slow the spread of COVID-19.”<sup>6/</sup> In the subsequent days and weeks, the Commission continued to come to the aid of the American public, granting additional STA requests to permit T-Mobile and others to use spectrum for which they are not licensed, in order to better support consumers’ use of telehealth, distance learning, and telework, and to simply remain connected during this unique and unprecedented situation.<sup>7/</sup>

But as neither Chairman Pai nor anyone else could have predicted in mid-March, when the Commission first granted T-Mobile’s request, the country was just at the beginning of the response to the pandemic. Indeed, on March 13, 2020, when T-Mobile submitted its first STA request, few states had required its residents to remain indoors. Today, 26 states and the District of Columbia have some form of stay-at-home orders in place, while 19 other states have partial state lockdowns or some form of restrictions in place.<sup>8/</sup> And Chairman Pai recently extended his Keep Americans Connected Pledge, to which T-Mobile has recommitted, until June 30, 2020 to allow providers to continue to address the national emergency.<sup>9/</sup> Accordingly, the rationale for the STAs has even strengthened.

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<sup>4/</sup> See Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Donald Stockdale, Chief, Wireless Telecommunications Bureau, FCC (filed Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363051A2.pdf>.

<sup>5/</sup> See News Release, *FCC Provides T-Mobile Temporary Access to Additional Spectrum to Help Keep Americans Connected During Coronavirus Pandemic*, FCC (Mar. 15, 2020), <https://docs.fcc.gov/public/attachments/DOC-363051A1.pdf>.

<sup>6/</sup> *Id.* at 1.

<sup>7/</sup> See, e.g., News Release, *FCC Provides U.S. Cellular Temporary Access to Additional Spectrum to Help Keep Americans Connected During Coronavirus Pandemic*, FCC (Mar. 17, 2020), <https://docs.fcc.gov/public/attachments/DOC-363114A1.pdf>; News Release, *FCC Grants Verizon Temporary Spectrum Access to Keep Americans Connected During COVID-19 Pandemic*, FCC (Mar. 18, 2020), <https://docs.fcc.gov/public/attachments/DOC-363145A1.pdf>; News Release, *FCC Grants AT&T and Verizon Further Temporary Spectrum Access to Keep Americans Connected During Coronavirus Pandemic*, FCC (Mar. 20, 2020), <https://docs.fcc.gov/public/attachments/DOC-363211A1.pdf>.

<sup>8/</sup> See Sarah Mervosh, *et al.*, *See Which States Are Reopening and Which Are Still Shut Down*, THE NEW YORK TIMES (May 5, 2020), <https://www.nytimes.com/interactive/2020/us/states-reopen-map-coronavirus.html>; Holly Secon & Aylin Woodward, *A Map of the US Cities and States Under Lockdown – and Those That Are Reopening*, BUSINESS INSIDER (May 5, 2020), <https://www.businessinsider.com/us-map-stay-at-home-orders-lockdowns-2020-3>.

<sup>9/</sup> See *Keep Americans Connected Pledge Extension*.

T-Mobile can continue help. As the Commission is aware, T-Mobile has aggressively built out the 600 MHz spectrum for which it is authorized, delivering both Fourth Generation (“4G”) LTE and Fifth Generation (“5G”) wireless service nationwide.<sup>10/</sup> T-Mobile can continue to meet the unprecedented need for our country to be connected by having access to additional 600 MHz spectrum – deploying additional capacity in areas where it has already provided, and where it soon expects to provide, service, including in rural areas. More spectrum capacity will enable Americans to even more effectively telework, engage in distance learning (including taking tests and submitting homework, projects, and other coursework), obtain medical advice through telehealth, and simply remain connected to loved ones who may be quarantined, through applications like FaceTime. And, more capacity on T-Mobile’s network will ensure that first responders and others can communicate in the event of an escalating crisis.

Accordingly, and consistent with its previous requests, T-Mobile requests authority until June 30, 2020 to use the spectrum associated with call signs WQZM761 (600 MHz A Block covering PEA001 – New York, NY) and WQZM759 (600 MHz E Block covering PEA020 – Denver, CO), which are currently licensed to Comcast. As indicated in the attached consent, Comcast has consented to T-Mobile’s use of the spectrum.<sup>11/</sup> Comcast is not currently using the licensed spectrum and has agreed to support T-Mobile’s temporary use of it in support of its re-commitment to the Keep Americans Connected Pledge.

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T-Mobile looks forward to your prompt response. If you have any questions, please feel free to contact me directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

cc: (Electronically)  
ULScc@fcc.gov

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<sup>10/</sup> See, e.g., T-Mobile News, *T-Mobile Reports Record Financials and Strong Customer Growth in FY 2019, Beating Increased Guidance While Balancing Growth and Profitability* (Feb. 6, 2020), <https://www.t-mobile.com/news/t-mobile-q4-fy19-earnings>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, *et al.*, at 1 (filed Oct. 24, 2019) (reporting that T-Mobile is proceeding on, or ahead of, the schedule the Commission established for clearing the 600 MHz band).

<sup>11/</sup> As noted above, T-Mobile previously requested STA to operate on 600 MHz spectrum licensed to Comcast on March 15, 2020, to which the Commission consented by e-mail the same day under call sign WRFP638. As the attached indicates, Comcast has also consented to T-Mobile’s continued use of that spectrum through June 30, 2020. T-Mobile is therefore separately submitting a request for an extension until June 30, 2020 of the STA issued under call sign WRFP638.

Charles Mathias  
Stephen Buenzow  
Sommer Gilbert  
Elizabeth Fishel  
Blaise Scinto  
Susan Mickley  
Paul Malmud  
Peter Daronco  
John Schauble  
Dana Schaffer  
Sean Spivey  
Kari Hicks  
Cecilia Sulhoff  
Connie Diaz

Kung, Angela

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Subject: FW: 600Mhz STA

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**From:** Nagel, Tom (Corporate) <[Tom\\_Nagel@comcast.com](mailto:Tom_Nagel@comcast.com)>  
**Sent:** Friday, May 8, 2020 11:26 AM  
**To:** Mosa, Dirk <[Dirk.Mosa@T-Mobile.com](mailto:Dirk.Mosa@T-Mobile.com)>  
**Cc:** Don, David <[David\\_Don@Comcast.com](mailto:David_Don@Comcast.com)>  
**Subject:** 600Mhz STA

[External]

Dirk,

Great talking to you. As we discussed, Comcast is OK with extending the STA on our 600Mhz licenses until June 30<sup>th</sup>. Also, we are also OK with including Denver and NYC in this stay. [REDACTED]

[REDACTED]

[REDACTED]

Tom

**FCC 601**  
**Main Form**

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

Approved by OMB  
3060 - 0798  
See instructions for  
public burden estimate

1) Radio Service Code:  WT	1a) Existing Radio Service Code:
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**General Information**

2) (Select only one) ( NE ) <b>NE</b> - New <b>RO</b> - Renewal Only <b>AU</b> - Administrative Update <b>NT</b> - Required Notifications <b>MD</b> - Modification <b>RM</b> - Renewal/Modification <b>WD</b> - Withdrawal of Application <b>EX</b> - Requests for Extension of Time <b>AM</b> - Amendment <b>CA</b> - Cancellation of License <b>DU</b> - Duplicate License <b>RL</b> - Registered Location/Link	
3a) If this application is for a <u>D</u> evelopmental License, <u>D</u> emonstration License, or a <u>S</u> pecial Temporary Authorization (STA), enter the code and attach the required exhibit as described in the instructions. Otherwise enter ' <u>N/A</u> ' (Not Applicable).	( S ) <u>D</u> <u>M</u> <u>S</u> <u>N/A</u>
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 ) <u>Yes</u> <u>No</u>
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).	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).	(   ) <u>Yes</u> <u>No</u>
8) Are attachments (other than associated schedules) being filed with this application?	( Y ) <u>Yes</u> <u>No</u>

**Fees, Waivers, and Exemptions**

9) Is the Applicant exempt from FCC application fees?	( N ) <u>Yes</u> <u>No</u>
10) Is the Applicant exempt from FCC regulatory fees?	( N ) <u>Yes</u> <u>No</u>
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.	( N ) <u>Yes</u> <u>No</u>
11b) If 11a is 'Y', and a feeable waiver request is attached, enter the number of rule sections involved.	Number of Rule Section(s): _____
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 ) <u>Yes</u> <u>No</u>



**Applicant Information**

13) FCC Registration Number (FRN): 0001565449			
14) Applicant/Licensee Legal Entity Type: (Select One) ( ) Individual ( ) Unincorporated Association ( ) Trust ( ) Government Entity ( ) Corporation ( X ) Limited Liability Company ( ) General Partnership ( ) Limited Partnership ( ) Limited Liability Partnership ( ) Consortium ( ) 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?			( ) Yes <b>No</b>
16) First Name (if individual):	MI:	Last Name:	Suffix:
17) Legal Entity Name (if other than individual): T-Mobile License LLC			
18) Attention To: FCC Regulatory Comp.			
19) P.O. Box:	And/Or	20) Street Address: 12920 SE 38th Street	
21) City: Bellevue		22) State: WA	23) Zip Code: 98006
24) Telephone Number: (425) 383-8401		25) Fax: (425) 383-4040	
26) E-Mail Address: fccregulatorycompliancecontact@t-mobile.com			

**27) Demographics (Optional)**

Race: ( ) American Indian or Alaska Native ( ) Asian ( ) Black or African-American ( ) Native Hawaiian or Other Pacific Islander ( ) White	Ethnicity: ( ) Hispanic or Latino ( ) Not Hispanic or Latino	Gender: ( ) Male ( ) Female
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**Real Party in Interest**

28) Name of Real Party in Interest of Applicant (If different from Applicant): T-Mobile US, Inc.	29) FCC Registration Number (FRN) of Real Party in Interest: 0014194476
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**Contact Information (If different from the Applicant)****( ) Check here if same as Applicant.**

30) First Name: Russell	MI: H	Last Name: Fox	Suffix:
31) Company Name: Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.			
32) Attention To:			
33) P.O. Box:	And /Or	34) Street Address: 701 Pennsylvania Avenue, N.W., Suite 900	
35) City: Washington		36) State: DC	37) Zip Code: 20004
38) Telephone Number: (202) 434-7483		39) Fax: (202) 434-7400	
40) E-Mail Address: rfox@mintz.com			

41) This filing is for authorization to provide or use the following type(s) of radio service offering (enter all that apply):

( ☒ ) **Common Carrier**    ( ☐ ) **Non-Common Carrier**    ( ☐ ) **Private, internal communications**    ( ☐ ) **Broadcast Services**    ( ☐ ) **Band Manager**

42) This filing is for authorization to provide the following type(s) of radio service (choose all that apply):	
( <input type="checkbox"/> ) <u>F</u> ixed	( X <input checked="" type="checkbox"/> ) <u>M</u> obile
( <input type="checkbox"/> ) <u>R</u> adiolocation	( <input type="checkbox"/> ) <u>S</u> atellite (sound)
( <input type="checkbox"/> ) <u>B</u> roadcast Services	
43) Does the Applicant propose to provide service interconnected to the public telephone network?	
( <input checked="" type="checkbox"/> ) <u>Y</u> es	<u>N</u> o

44) Is the Applicant a foreign government or the representative of any foreign government?	( <input type="radio"/> N ) <u>Yes</u> <u>No</u>
45) Is the Applicant an alien or the representative of an alien?	( <input type="radio"/> N ) <u>Yes</u> <u>No</u>
46) Is the Applicant a corporation organized under the laws of any foreign government?	( <input type="radio"/> N ) <u>Yes</u> <u>No</u>
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 type="radio"/> N ) <u>Yes</u> <u>No</u>

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? ( Y ) 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).

*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 Section 1.990(a) of the Commission's Rules, 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 Section 1.994(b) of the Rules, 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 Section 1.994(b) of the Rules, 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 Section 1.990(a) of the Commission's Rules, 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 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).*

**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 denied by the Commission?	( <input type="radio"/> N ) <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 type="radio"/> N ) <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 type="radio"/> N ) <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="radio"/> ) 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.
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**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="radio"/> ) <input checked="" type="radio"/> 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 Section 27.1202 of the Commission's Rules) in a cable television system whose franchise area is located within the geographic service area of the requested facilities?	( <input type="radio"/> ) <input checked="" type="radio"/> Yes <input type="radio"/> No

**Note:** If the answer to question 53b is 'Y', attach an exhibit explaining how the Applicant complies with Section 27.1202 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'.

**Broadband Radio Service and Educational Broadband Service (Part 27)**

54) (For EBS only) Does the Applicant comply with the programming requirements contained in Section 27.1203 of the Commission's Rules?	( <input type="radio"/> ) <input checked="" type="radio"/> Yes <input type="radio"/> No
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**Note:** If the answer to item 54 is 'N', attach an exhibit explaining how the Applicant complies with Section 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 Sections 27.50, 27.55, and 27.1221 of the Commission's Rules?	( <input type="radio"/> ) <input checked="" type="radio"/> Yes <input type="radio"/> No
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**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="radio"/> ) <input checked="" type="radio"/> Yes <input type="radio"/> No
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**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 § 1.2002(b) of the rules, 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: Steve	MI: B	Last Name: Sharkey	Suffix:
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58) Title: Vice President, Government Affairs, Technology and Engineering Policy

Signature:



59) Date:

5/11/2020

**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).

**FCC 601****Schedule B****MARKET/CHANNEL BLOCK INFORMATION****Schedule for Geographically Licensed Services**

Approved by OMB

3060 – 0798

See 601 Main Form Instructions  
for public burden estimate

1) Market Designator	2) Market Name	3) Channel Block	4) Sub-Market Designator	5) Type of bidding credit requested	6) Open/Closed Bidding	7) I Am Seeking A Tribal Lands Bidding Credit In This Market
PEA001	New York, NY	A	0		Open	( ) <u>Yes</u> ( X ) <u>No</u>
						( ) <u>Yes</u> ( ) <u>No</u>
						( ) <u>Yes</u> ( ) <u>No</u>

**TRIBAL LANDS INFORMATION**

8) Market Designator	9) Channel Block	10) Name of Tribal Lands	11) Area, in square kms, of tribal lands contained within designated market	12) Indicate with an "x" those tribal lands where Applicant has secured the required certification(s) from the tribal governments [attach certification(s)]	13) The amount of bidding credit as defined by FCC Rules (by Market)	14) Additional amount of bidding credit requested (attach justification)

**Agreements**

<p>15a) Agreements Regarding Designated Entities (e.g., Small Businesses and Rural Service Providers) and Closed Bidding.</p> <p>Has the Applicant entered into any agreements or arrangements, written or oral, which could affect its overall eligibility for designated entity benefits, including, where applicable, its eligibility to participate in closed bidding or its eligibility for the award of designated entity benefits for any particular license for which it claimed a bidding credit? If answering 'Y', proceed to item 16, check 'Add' for the Action Requested, select 'Designated Entity' and/or 'Closed Bidding' as the type of agreement, enter the unique identifying name of the agreement, and check the appropriate block of the party(ies) to agreement for either Entity Name or Individual Name. If filing is for an entity, enter the legal entity name. If filing is for an individual, enter the first name, middle initial, last name and suffix of the individual. Provide the FCC Registration Number of the party(ies) to the agreement. Attach an exhibit summarizing the agreements (with appropriate references to specific provisions in the text of such agreements and instruments and the date(s) on which the Applicant entered into the agreements) and provide copies of the agreements. If it is an agreement for the use of any spectrum capacity of the license(s) subject to this application, list in the exhibit any Disclosable Interest Holders (DIH) that hold a ten percent or greater interest in the Applicant and that use or have an agreement to use, on a license-by-license basis, more than 25% of the spectrum capacity of any license(s) awarded with bidding credits. Indicate what percentage of spectrum capacity (as measured in megahertz) the DIH uses or has an agreement to use for each license.</p>	<p>( ) <u>Yes</u> ( X ) <u>No</u></p>
<p>15b) Agreements with Other Parties and Joint Bidding Arrangements.</p> <p>Between the Form 175 deadline and through the release of the auction closing public notice, has the Applicant, or any party that controls or is controlled by the Applicant, entered into any partnerships, joint ventures, consortia, or other agreements, arrangements, and/or understandings of any kind relating to the licenses in this application, including any agreements that address or communicate directly or indirectly bids (including specific prices), bidding strategies (including the specific licenses on which to bid or not to bid), or the post-auction market structure. If answering 'Y', proceed to item 16, check 'Add' for the Action Requested, select the type of agreement, enter the unique identifying name of the agreement, and check the appropriate block of the party(ies) to agreement for either Entity Name or Individual Name. If filing is for an entity, enter the legal entity name. If filing is for an individual, enter the first name, middle initial, last name and suffix of the individual. Provide the FCC Registration Number of the party(ies) to the agreement. Attach an exhibit describing the terms and conditions and identifying all parties to the agreement or arrangement.</p>	<p>( ) <u>Yes</u> ( X ) <u>No</u></p>

**16) Agreement Identifier:** Action Requested: ☐ Add ☐ Delete

Type of Agreement: ☐ Collusion-Based ☐ Designated Entity ☐ Closed Bidding ☐ Bidding/Joint Bidding ☐ Joint Venture ☐ Partnership  
☐ Consortium ☐ Post-Auction Market Structure ☐ Operational ☐ Transfer/Assignment  
☐ Other (Description of Type of Agreement) \_\_\_\_\_

Agreement Name:

**Party(ies) to Agreement(s)**

Action Requested: ☐ Add ☐ Delete

<input type="checkbox"/> Entity Name:	Legal Entity Name			FCC Registration Number (FRN):	
<input type="checkbox"/> Individual Name:	First	MI	Last	Suffix	
FCC Registration Number (FRN):					

Action Requested: ☐ Add ☐ Delete

<input type="checkbox"/> Entity Name:	Legal Entity Name			FCC Registration Number (FRN):	
<input type="checkbox"/> Individual Name:	First	MI	Last	Suffix	
FCC Registration Number (FRN):					

Action Requested: ☐ Add ☐ Delete

<input type="checkbox"/> Entity Name:	Legal Entity Name			FCC Registration Number (FRN):	
<input type="checkbox"/> Individual Name:	First	MI	Last	Suffix	
FCC Registration Number (FRN):					

**17) Additional Demographic Information (Not Required)**

Applicant Status:

☐ Minority Owned Business☐ Rural Telephone Company☐ Woman Owned Business**Revenue and Asset Information**

18) Has any Revenue and Asset information changed for the Applicant, the Disclosable Interest Holder, or the Affiliate? If 'Y', explain why in an exhibit.

( ) Yes **No****19) Revenue and Asset Information for the Applicant****Purpose (Check Modify and complete all changes different from previously filed FCC Form 175)**☐ Modify**Gross Revenue Disclosure Most Recent Reportable Year**

20a) Were the Applicant and any predecessors-in-interest in existence for a full year of the relevant period? If 'N', explain why in an attachment.

( ) Yes **No**

If 'Y', provide the following information.

20b) Gross Revenues \$ \_\_\_\_\_ (Format: 99,999.99)

20c) Year-end Date: \_\_\_\_\_ (Date Format: MM/DD/YYYY)

**One Year Prior to Most Recent Reportable Year**

21a) Were the Applicant and any predecessors-in-interest in existence for a full year of the relevant period? If 'N', explain why in an attachment.

( ) Yes **No**

If 'Y', provide the following information.

21b) Gross Revenues \$ \_\_\_\_\_ (Format: 99,999.99)

21c) Year-end Date: \_\_\_\_\_ (Date Format: MM/DD/YYYY)

**Two Years Prior to Most Recent Reportable Year**

22a) Were the Applicant and any predecessors-in-interest in existence for a full year of the relevant period? If 'N', explain why in an attachment.

( ) Yes **No**

If 'Y', provide the following information.

22b) Gross Revenues \$ \_\_\_\_\_ (Format: 99,999.99)

22c) Year-end Date: \_\_\_\_\_ (Date Format: MM/DD/YYYY)

**Average Gross Revenue**

23) Average Gross Revenue of Reported Years: \$ \_\_\_\_\_ (Format: 99,999.99)

**Asset Disclosure**

24) Total Assets as of Application Filing Deadline: \$ \_\_\_\_\_ (Format: 99,999.99)

**Financial Statements**

25) Audited or Unaudited (Check One)

☐ The Applicant used audited financial statements.☐ The Applicant used unaudited financial statements prepared in accordance with Generally Accepted Accounting Principles (GAAP) and certified by the Applicant's chief financial officer or the equivalent.



**FCC 601  
Schedule B**

**26) Revenue and Asset Information for Each Disclosable Interest Holder (DIH) (including each of Applicant's Controlling Interests, and Affiliates of its controlling interests)**

**Purpose (Select One)**

<input type="checkbox"/> Add	<input type="checkbox"/> Modify	<input type="checkbox"/> Delete
------------------------------	---------------------------------	---------------------------------

**27) Disclosable Interest Holder**

Entity Name:				FCC Registration Number (FRN):
<input type="checkbox"/> Individual Name: First	MI	Last	Suffix	FCC Registration Number (FRN):

**Gross Revenue Disclosure Most Recent Reportable Year**

28a) Were the Disclosable Interest Holder and any predecessors-in-interest in existence for a full year of the relevant period? If 'N', explain why in an attachment.	( ) <u>Yes</u> <u>No</u>
If 'Y', provide the following information.	
28b) Gross Revenues	\$ _____ (Format: 99,999.99)
28c) Year-end Date:	_____ (Date Format: MM/DD/YYYY)

**One Year Prior to Most Recent Reportable Year**

29a) Were the Disclosable Interest Holder and any predecessors-in-interest in existence for a full year of the relevant period? If 'N', explain why in an attachment.	( ) <u>Yes</u> <u>No</u>
If 'Y', provide the following information.	
29b) Gross Revenues	\$ _____ (Format: 99,999.99)
29c) Year-end Date:	_____ (Date Format: MM/DD/YYYY)

**Two Years Prior to Most Recent Reportable Year**

30a) Were the Disclosable Interest Holder and any predecessors-in-interest in existence for a full year of the relevant period? If 'N', explain why in an attachment.	( ) <u>Yes</u> <u>No</u>
If 'Y', provide the following information.	
30b) Gross Revenues	\$ _____ (Format: 99,999.99)
30c) Year-end Date:	_____ (Date Format: MM/DD/YYYY)

**Average Gross Revenue**

31) Average Gross Revenue of Reported Years: \$ _____ (Format: 99,999.99)
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**Asset Disclosure**

32) Total Assets as of Application Filing Deadline: \$ _____ (Format: 99,999.99)
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**Financial Statements**

33) Audited or Unaudited (Check One)
<input type="checkbox"/> The Disclosable Interest Holder (DIH) used audited financial statements.
<input type="checkbox"/> The DIH used unaudited financial statements prepared in accordance with Generally Accepted Accounting Principles (GAAP) and certified by the DIH's chief financial officer or the equivalent.

**FCC 601  
Schedule B**

**34) Revenue and Asset Information for Each Affiliate  
Purpose (Select One)**

<input type="checkbox"/> Add	<input type="checkbox"/> Modify	<input type="checkbox"/> Delete
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**35) Affiliate**

Entity Name:				FCC Registration Number (FRN):
<input type="checkbox"/> Individual Name: First	MI	Last	Suffix	FCC Registration Number (FRN):

**Gross Revenue Disclosure Most Recent Reportable Year**

36a) Were the Affiliate and any predecessors-in-interest in existence for a full year of the relevant period? If 'N', explain why in an attachment.	( ) <u>Yes</u> <b>No</b>
If 'Y', provide the following information.	
36b) Gross Revenues	\$ _____ (Format: 99,999.99)
36c) Year-end Date:	_____ (Date Format: MM/DD/YYYY)

**One Year Prior to Most Recent Reportable Year**

37a) Were the Affiliate and any predecessors-in-interest in existence for a full year of the relevant period? If 'N', explain why in an attachment.	( ) <u>Yes</u> <b>No</b>
If 'Y', provide the following information.	
37b) Gross Revenues	\$ _____ (Format: 99,999.99)
37c) Year-end Date:	_____ (Date Format: MM/DD/YYYY)

**Two Years Prior to Most Recent Reportable Year**

38a) Were the Affiliate and any predecessors-in-interest in existence for a full year of the relevant period? If 'N', explain why in an attachment.	( ) <u>Yes</u> <b>No</b>
If 'Y', provide the following information.	
38b) Gross Revenues	\$ _____ (Format: 99,999.99)
38c) Year-end Date:	_____ (Date Format: MM/DD/YYYY)

**Average Gross Revenue**

39) Average Gross Revenue of Reported Years: \$ _____ (Format: 99,999.99)
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**Asset Disclosure**

40) Total Assets as of Application Filing Deadline: \$ _____ (Format: 99,999.99)
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**Financial Statements**

41) Audited or Unaudited (Check One)
<input type="checkbox"/> The Affiliate used audited financial statements.
<input type="checkbox"/> The Affiliate used unaudited financial statements prepared in accordance with Generally Accepted Accounting Principles (GAAP) and certified by the Affiliate's chief financial officer or the equivalent.

**FCC 601  
Schedule B**

**Closed Bidding/Designated Entity Eligibility**

**Total Gross Revenues for Most Recent Reportable Year**

42a) Gross Revenues \$ \_\_\_\_\_ (Format: 99,999.99)  
42b) Year-end Date: \_\_\_\_\_ (Date Format: MM/DD/YYYY)

**Total Gross Revenues for One Year Prior to Most Recent Reportable Year**

43a) Gross Revenues: \$ \_\_\_\_\_ (Format: 99,999.99)  
43b) Year-end Date: \_\_\_\_\_ (Date Format: MM/DD/YYYY)

**Total Gross Revenues for Two Years Prior to Most Recent Reportable Year**

44a) Gross Revenues: \$ \_\_\_\_\_ (Format: 99,999.99)  
44b) Year-end Date: \_\_\_\_\_ (Date Format: MM/DD/YYYY)

**Total Aggregate Average Gross Revenues for Designated Entity**

45) Aggregate Average Gross Revenue: \$ \_\_\_\_\_ (Format: 99,999.99)

**Total Aggregate Average Gross Revenues for Closed Bidding**

46) Aggregate Average Gross Revenue: \$ \_\_\_\_\_ (Format: 99,999.99)

**Total Assets Disclosure for Closed Bidding**

47) Total Assets: \$ \_\_\_\_\_ (Format: 99,999.99)

**Rural Service Provider Bidding Credit**

48) Is the Applicant seeking a Rural Service Provider (RSP) bidding credit?	( N ) <u>Yes</u> <del>No</del>
<p>If 'Y', in an exhibit provide the following information:</p> <p>a) for the Applicant, submit the combined number of commercial communications service subscribers to wireless, wireline, broadband, and cable services that the Applicant serves and provide a list of the name(s) and the Federal Information Processing Standard (FIPS) number(s) for each county in which the Applicant has at least one commercial wireless, wireline, broadband, or cable subscriber;</p> <p>b) for each of the Applicant's Affiliates, Controlling Interests, and the Affiliates of its Controlling Interests, submit the individual or entity's name, its FCC Registration Number (FRN), its relationship to the Applicant, and its combined number of commercial communications service subscribers to wireless, wireline, broadband, and cable services. For each of the Applicant's Affiliates, Controlling Interests, and the Affiliates of its Controlling Interests, also provide a list of the name(s) and the FIPS number(s) for each county in which it has at least one commercial wireless, wireline, broadband, or cable subscriber;</p> <p>c) for each Disclosable Interest Holder (DIH) in the Applicant that will use, or has an agreement to use, more than 25% of the spectrum capacity of any license(s) to be acquired with bidding credits, submit the individual or entity's name, its FRN, its relationship to the Applicant, the combined number, if any, of commercial communications services subscribers to wireless, wireline, broadband, and cable services that the DIH serves and whether the Applicant asserts that the DIH is independently eligible for the RSP bidding credit;</p> <p>d) if neither the Applicant, nor any of its Affiliates, its Controlling Interests, or the Affiliates of its Controlling Interests have at least one wireless, wireline, broadband, or cable subscriber in a market for which the Applicant is applying for a license, list the market(s) in which the Applicant, its Affiliates, its Controlling Interests, and the Affiliates of its Controlling Interests have no such subscribers;</p> <p>e) a detailed explanation demonstrating that: (i) the Applicant is in the business of providing commercial communications services; (ii) the Applicant serves predominantly rural areas; and (iii) the primary focus of the Applicant's business activity is the provision of services to rural areas (defined as counties with a population density of 100 or fewer persons per square mile); and</p> <p>f) If the Applicant is an existing rural partnership that was providing service as of July 16, 2015, provide a detailed explanation demonstrating that each member of the partnership is independently eligible for the RSP bidding credit by providing, with respect to each member of the partnership, the same information as is required in a-e above.</p>	

**Certifications** (By signing the Main Form, the Applicant certifies that the statements listed are true, complete, correct and made in good faith)

**For Applicants Claiming Eligibility as an Entrepreneur Under the General Rule**

Applicant certifies that it is eligible to obtain the licenses for which it applied.

**For Applicants Claiming Eligibility as a Publicly Traded Corporation**

Applicant certifies that it is eligible to obtain the licenses for which it applied and that it is complying with the definition of a Publicly Traded Corporation, as set out in the applicable FCC rules

**For Applicants Claiming Eligibility using a Control Group Structure**

Applicant certifies that it is eligible to obtain the licenses for which it applied.

Applicant certifies that the Applicant's sole control group member is a pre-existing entity, if applicable.

**For Applicants Claiming Eligibility as a Designated Entity**

Applicant certifies that it is eligible to obtain the licenses for which it applied.

Applicant certifies that the Applicant's sole control group member is a pre-existing entity, if applicable.

Applicant certifies that it provided all agreements or arrangements that provide for the use by a Disclosable Interest Holder of more than 25% of the spectrum capacity (as measured in megahertz) of any license(s) that will be acquired with bidding credits.

**For Applicants Claiming Eligibility as a Rural Telephone Company**

Applicant certifies that it meets the definition of a Rural Telephone Company as set out in the applicable FCC rules, and disclosed all parties to agreement(s) to partition licenses won in this auction. See applicable FCC rules.

**For Applicants Claiming Tribal Lands Bidding Credit**

Applicant certifies that it will comply with the bidding credit buildout requirements and consult with the tribal government(s) regarding the siting of facilities and deployment of service on the tribal land(s) as set out in the applicable FCC rules.

**For Auction Applicants**

Applicant certifies that it provided separate gross revenue information for itself, for each of Applicant's officers and directors; for each of Applicant's other Controlling Interests; for each of Applicant's Affiliates; and for each Affiliate of each of Applicant's officers, directors, and other Controlling interests.

Applicant certifies that it provided separate gross revenue and total asset information for itself, for each of Applicant's officers and directors; for each of Applicant's other Controlling Interests; for each of Applicant's Affiliates; and for each Affiliate of each of Applicant's officers, directors, and other Controlling Interests.

Applicant certifies that it has provided a description of, and identified each party to, any partnerships, joint ventures, consortia, or other agreements, arrangements, or understandings of any kind relating to the licenses in this application, including any agreements that address or communicate directly or indirectly bids (including specific prices), bidding strategies (including the specific licenses on which to bid or not to bid), or the post-auction market structure, to which the Applicant, or any party that controls or is controlled by the Applicant, is a party, and which were entered into as of the Form 175 deadline and through the release of the auction closing public notice.

Applicant certifies that, except for agreements, arrangements or understandings specifically excluded under Part 1 of the Commission's rules, as of the Form 175 deadline and through the release of the auction closing public notice, the Applicant, or any party that controls or is controlled by the Applicant, did not enter any partnerships, joint ventures, consortia, or other agreements, arrangements, or understandings of any kind relating to the licenses in this application, including any agreements that address or communicate, directly or indirectly, bids, (including specific prices), bidding strategies (including the specific licenses on which to bid or not to bid), or the post-auction market structure, with: any other applicant (or any party that controls or is controlled by another applicant), with a nationwide provider that is not an applicant (or any party that controls or is controlled by such a nationwide provider); or if the applicant is a nationwide provider, with any non-nationwide provider that is not an applicant (or with any party that controls or is controlled by such a non-nationwide provider).

**For Applicants Claiming Rural Service Provider Bidding Credit Eligibility**

Applicant certifies that it provided separate subscribership information for itself and for each of Applicant's Affiliates, Controlling Interests, and the Affiliates of its Controlling Interests.

**For Applicants Claiming Reserve Spectrum Eligibility**

Applicant certifies that, as of the FCC Form 175 filing deadline, it met the qualification criteria to bid on the reserved license(s) for which it applies in this Form 601.

**T-Mobile License, LLC**  
**Request for Special Temporary Authority**  
**FCC Form 601**

**Foreign Ownership Statement**

T-Mobile License LLC is a wholly-owned subsidiary of T-Mobile USA, Inc. (“T-Mobile USA”). T-Mobile USA, in turn, is a wholly-owned direct subsidiary of T-Mobile US, Inc. (“T-Mobile US”), a publicly-traded U.S. corporation. Deutsche Telekom AG (“DT”), a publicly-traded German corporation,<sup>1/</sup> holds a 43.10 percent interest in T-Mobile US and, indirectly, in T-Mobile USA. Pursuant to Section 310(b)(4) of the Communications Act of 1934, as amended,<sup>2/</sup> the Commission authorized up to 100 percent direct and indirect foreign investment in the T-Mobile US common carrier licensees (including T-Mobile License LLC) by DT and its shareholders, subject to certain conditions.<sup>3/</sup> The foreign ownership in the licensee as approved has not materially changed since December 30, 2013 and will not be affected by the instant application.

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<sup>1/</sup> Germany is a signatory to the World Trade Organization Basic Agreement on Telecommunications.

<sup>2/</sup> See 47 U.S.C. § 310(b)(4).

<sup>3/</sup> See *Applications of Deutsche Telekom AG, T-Mobile USA, Inc., and MetroPCS Communications, Inc. for Consent to Transfer of Control of Licenses and Authorizations*, Memorandum Opinion and Order and Declaratory Ruling, 28 FCC Rcd 2322 (2013); File No. ISP-PDR-20130924-00006 (filed Sept. 24, 2013 and supplemented Oct. 24, 2013); *International Authorizations Granted*, Public Notice, Report No. TEL- 01650, 29 FCC Rcd 140 (2014).