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March 1, 2019

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W., Suite TW-A325  
Washington, DC 20554

**RE: Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket No. 06-36  
PDV Spectrum Holding Company, LLC  
FRN 0023948573**

Dear Ms. Dortch:

PDV Spectrum Holding Company, LLC, by its attorneys and pursuant to Section 64.2009(e) of the Commission's rules, hereby refiles the attached letter previously submitted to the Commission in lieu of the FCC's annual CPNI Certification. If there are any questions regarding this submission, please contact the undersigned.

Very truly yours,



Katherine Patsas Nevitt

Enclosures

cc: Best Copy and Printing, Inc.

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EB Docket No. 06-36  
PDV Spectrum Holding Company, LLC  
FRN 0023948573**

Dear Ms. Dortch:

PDV Spectrum Holding Company, LLC, by its attorneys and pursuant to Section 64.2009(e) of the Commission's rules, hereby submits the attached letter in lieu of the FCC's annual CPNI Certification. If there are any questions regarding this submission, please contact the undersigned.

Very truly yours,



Katherine Patsas Nevitt

Enclosures

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Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW Suite TW-A325  
Washington, D.C. 20554

Re: **47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket No. 06-36**  
**PDV Spectrum Holding Company, LLC**  
**FRN 0023948573**

Dear Ms. Dortch:

PDV Spectrum Holding Company, LLC (“Company”) hereby files this letter in lieu of a Customer Proprietary Network Information (“CPNI”) certification statement. In an Order dated December 3, 2010 (DA 10-2282) (“December 2010 Order”), the Federal Communications Commission (“FCC”) rescinded Notices of Apparent Liability for Forfeiture (“NALFs”) against several hundred entities stating that the FCC had determined that those entities did not have an obligation to submit a CPNI certification for the year in question. A number of those entities had responded to the NALFs by explaining that they operated two-way radio, dispatch-only systems that were not interconnected with the public switched network. The Company operates a non-interconnected, two-way radio, dispatch-only system identical to the operations described by those entities. Accordingly, the Company believes it is not required to make an annual CPNI filing.

Should the Company modify its current service offerings to include those for which a CPNI certification is required or if directed to file by the FCC, the Company will submit a CPNI certification. Should the Commission have any questions, please contact the undersigned or the Company’s counsel, Katherine Patsas Nevitt and Elizabeth R. Sachs, at 703-584-8676 / [kpatsas@fcclaw.com](mailto:kpatsas@fcclaw.com) or 703-584-8663 / [lsachs@fcclaw.com](mailto:lsachs@fcclaw.com) respectively.

**PDV Spectrum Holding Company, LLC**

By

A handwritten signature in black ink, appearing to read 'John Pescatore', written over a horizontal line.

Name: John Pescatore

Title: President & CEO

Date: March 1, 2018