

Stamp Copy

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

**Accepted / Filed**

In the Matter of )  
 )  
Blanca Telephone Company )  
 )  
Seeking Relief From the June 2, 2016 )  
Letter Issued by the Deputy Managing )  
Director Which Seeks to Enforce an )  
Interpretation of the Commission's Rules )  
Regarding the Use of USF High Cost )  
Funding for the Purpose of Operating a )  
Rural Mobile Cellular Telephone System )  
During the 2005-2010 Time Period )

**MAR 30 2017**

**Federal Communications Commission  
Office of the Secretary**

**To: The Secretary  
ATTN: The Commission**

**SECOND MOTION FOR LEAVE TO SUPPLEMENT  
EMERGENCY APPLICATION FOR REVIEW  
AND  
NOTICE OF DISCONTINUATION OF KNKQ427/KNKR288 CELLULAR SERVICE**

**Blanca Telephone Company  
Timothy E. Welch, Esq.  
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welchlaw@earthlink.net  
March 30, 2019**

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**welchlaw@earthlink.net**  
**March 30, 2019**

## **Introduction**

Blanca Telephone Company (Blanca), by its attorney, pursuant to 47 C.F.R. § 1.41, § 1.106(b)(2)(i) (changed circumstances or recent event requires supplement), § 1.106(f) (authorizing requests to supplement pleadings), and § 1.115(g)(1) (recent events or changed circumstances since last filing), hereby seeks leave to supplement its June 16, 2016 Emergency Application for Review, or its June 24, 2016 Petition for Reconsideration in the event the Commission denies Blanca's exhaustion waiver request found at Application for Review, page 4. As discussed in the Petition for Reconsideration, at 1 n. 1, it appears that the Commission denied Blanca's exhaustion waiver request which necessitated the need to file the Petition for Reconsideration.<sup>1</sup> In support whereof, the following is respectfully submitted:

### **Notice of Cellular Service Discontinuation**

The purpose of this submission is to inform the Commission that as a result of a combination of events, as of March 28, 2017 Blanca ceased providing service over its Part 22 cellular stations KNKQ427 and KNKR288. Blanca considers that the information is factually useful in the Commission's consideration of the USF funding issue currently under review, provides information regarding the difficulty in operating a cellular service in a very rural area for the Commission's general information collection purposes, and serves to notify the Commission of the termination of Blanca's cellular service.<sup>2</sup>

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<sup>1</sup> The Petition for Reconsideration is a reformatted version of the Application for Review to meet the filing requirements applicable to reconsideration petitions filed under § 1.106 and it was filed in response to the Commission's suggestion in a letter that Blanca's waiver request had been denied. Otherwise, the two pleadings are substantially similar. However, other than suggesting that Blanca's waiver request had been denied, the Commission has not provided any further guidance regarding Blanca's administrative exhaustion waiver request.

<sup>2</sup> In late 2015 Blanca advised Commission staff that it intended to terminate cellular service and obtained information about the procedures to be followed to implement service termination. The  
(continued...)

**Event #1:** As discussed in previously filed pleadings, the withdrawal of USF funding caused Blanca's cellular system to operate at a loss, prevented Blanca from maintaining and upgrading the system's infrastructure, and caused Blanca's cellular system to wither on the vine. Blanca did not control the FCC/NECA determination in 2013 that Blanca's rural mobile cellular system is not entitled to USF support. The FCC determined that Blanca's rural cellular service, including the emergency services capacity provided by Blanca's cellular system, is not something that the Commission wanted to provide funding support for in Colorado's Conejos and Costilla Counties. That is a Commission decision over which Blanca exercised no control, and while the Commission has never explained to Blanca the public interest benefits which flow from the denial of rural cellular service funding, Blanca is bound by the Commission's determination as a matter of law and as a matter of economics.

**Event #2:** On December 14, 2016 the local PSAP issued a demand to Blanca, after receiving some type of *ex parte* notice from Verizon that the PSAP needed to contact Blanca about the need for Blanca to provide E911 emergency services, which imposed a six month time limit for Blanca to install E911 Phase II capability on Blanca's cellular Stations KNKQ427 & KNKR288. Attachment at page 1 of 7 (December 14, 2016 letter from Pamela Stewart to Alan Wehe).<sup>3</sup> Blanca had previously explained to the PSAP and to the Commission: 1) that Blanca would need to rebuild

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<sup>2</sup>(...continued)

information Blanca obtained concerned the need to provide notice to subscribers and Commission staff helped undersigned counsel draft an appropriate subscriber notice. Blanca delivered at least two written service termination notices to subscribers between the end of 2015 and the end of 2016.

<sup>3</sup> This was the second time that the PSAP had ordered E911 service from Blanca. The PSAP's first demand for E911 service, issued on July 28, 2015, was withdrawn at Verizon's request while Blanca and Verizon negotiated the assignment of Blanca's cellular licenses to a Partnership jointly owned by Blanca and Verizon. See Attachment page 6 of 7 (the PSAP's November 17, 2015 email notifying Verizon and Blanca that it had withdrawn its July 2015 E911 service demand); see also Attachment page 3 of 7 (June 16, 2016 email from William Hickey, Verizon's Executive Director - Strategic Alliances to undersigned counsel discussing the Blanca cellular license assignment plan).

its cellular network before it could install the requested emergency service capability at a projected cost of more than \$1 million; and 2) that because Blanca's cellular system was losing money on an ongoing operating basis, Blanca's cellular system could not support the expense of the buildout required to implement the PSAP's requested E911 upgrades.

In December 2016 the PSAP demanded that Blanca install E911 services notwithstanding its knowledge of the cellular system's financial situation and the deteriorated condition of the cellular system's physical assets. As a consequence of the legal requirement imposed by the PSAP to install the prohibitively expensive E911 service, and the potentially large FCC fine which would likely be imposed for failing to comply, Blanca was effectively forced to sell or terminate its provision of cellular service.<sup>4</sup> There is no obvious public interest benefit from PSAP's implicit determination that no Blanca cellular service in Blanca's rural market area is somehow better than some Blanca cellular service even without the E911 service availability. But it is what it is: Blanca does not control the PSAP's demand for installation of a prohibitively expensive E911 service.<sup>5</sup>

The FCC's PSAP staff and the FCC's licensing staff have been aware of Blanca's cellular

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<sup>4</sup> Several years ago the FCC denied Blanca's waiver request for a rule which required Blanca to have in stock two hearing aid compatible handsets. The FCC fined Blanca \$15,000 for having one of the two required handset models in stock where Blanca had received NO requests for such handsets. *Blanca Telephone Company, Notice of Apparent Liability for Forfeiture*, 23 FCC Rcd 9398 (SED, EB 2008). Blanca's prior waiver experience involving a single handset for which there was no public demand reasonably counsels extreme hesitancy at again testing the FCC's rule waiver process. Nor does Blanca have any desire to explore the FCC's forfeiture potential for failing to install an extremely complex and prohibitively expensive emergency alert and location system. The concern here is not just one handset, the emergency alert system could potentially be said to affect many times more handsets in a situation involving emergency services. The FCC's handling of the USF issue to date has not been fair, for instance the lack of notice/hearing for purported unspecified rule violations, the failure to comply with statute of limitations, the imposition of a pre-decision licensing administrative hold punishment, and the issuance of a ruinous forfeiture order strongly suggest a negative treatment of a Blanca E911 waiver request.

<sup>5</sup> At the time of system shut down Blanca still had several subscribers, but most had left the system either over time as a result of the system's physical decline or after having received at least two written notices of intended service discontinuation.

system's operational financial circumstances since at least 2015 and they have done nothing to assist Blanca's effort to implement E911 service. In fact, the licensing staff is under directions not to take any action on Blanca's pending applications including the unrelated sale of Blanca's 700 MHz license to AT&T and the license renewal application for Blanca's cellular Station KNKQ427.<sup>6</sup>

Blanca can only play with the cards dealt to it by the PSAP and the FCC and the cards dealt to Blanca by those governmental agencies require termination of cellular system operations after Blanca's 20+ years of service in the public interest, otherwise Blanca faces an unknown fine for failure to comply with the E911 service requirement imposed by the PSAP in December 2016. It is important to note that for the last six years or so Blanca has operated its cellular service while incurring operating losses, to the tune of about \$20,000 per month. Blanca went above and beyond in its service to the public and absorbed losses for years, but it has now been put out of the cellular service business by governmental bureaucracies who seem interested in obtaining emergency services only if those services are subsidized by Blanca Telephone Company. The fact is that the FCC made the decision to deny USF funding to Blanca in Conejos and Costilla Counties which could have supported Blanca's mobile services including the PSAP's requested emergency service.

**Event #3:** Since 2015 Blanca has been in periodic contact with the Commission's licensing and PSAP staff concerning Blanca's efforts to assign its two cellular licenses to a neighboring Partnership in which Blanca is one of the owners along with, *inter alia*, Verizon.<sup>7</sup> However,

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<sup>6</sup> In administrative parlance an "administrative hold" has been placed on Blanca's licensing filings.

<sup>7</sup> In a peculiarity of the Partnership, Verizon holds a total equity interest of about 70%, but Verizon does not exercise any level of legal control over the Partnership. Blanca has a total equity interest of about 15%, but exercises negative control over the Partnership. Verizon initially approached Blanca about acquiring the cellular licenses around October 2015 after Verizon had learned about Blanca's planned service discontinuation. Verizon expressed concern that the Partnership would be injured because Partnership roamers would lose service and Verizon, at least initially, worked to keep Blanca's system operating. Even Verizon views the licenses as a Partnership opportunity.

beginning in August 2016 Verizon threatened Blanca with legal action in the event Blanca tried to assign the Blanca cellular licenses to that Partnership. Verizon, citing the USF issue and its *ex parte* discussions with Commission staff, demanded that Blanca assign the Blanca licenses to Verizon or not at all.<sup>8</sup> See e.g. Attachment at page 2 of 7 (September 7, 2016 email from William Hickey, Verizon's Executive Director - Strategic Alliances, to undersigned counsel). Blanca and the Partnership believe that the Blanca licenses are a partnership opportunity, but Verizon demanded that Verizon be the assignee of the Blanca licenses under threat of litigation against Blanca if the licenses went to the Partnership.<sup>9</sup> Verizon is a multi-billion dollar publicly traded corporation with international businesses, Blanca is a small rural, domestic independent telephone company which lacks the resources to engage in Verizon's threatened expensive legal battle. So Blanca succumbed to Verizon's litigation threat which threat terminated Blanca's effort to assign the Blanca cellular licenses to the Partnership and which threat served as the last straw regarding the cellular service termination.

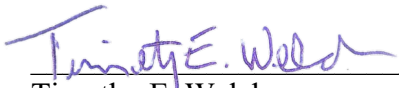
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<sup>8</sup> In mid-July 2016, at Verizon's request, undersigned counsel arranged for and participated in a conference call with the Commission staff to discuss the assignment of the Blanca licenses to the Partnership. While Commission staff indicated during that conference call that the USF issue would likely delay assignment application processing, the staff invited the filing of an assignment application. Verizon subsequently informed Blanca and undersigned counsel that Verizon's later held, *ex parte* discussions with FCC staff had indicated that license assignment to the Partnership was not something the Commission was willing to do and thereafter Verizon obstructed Blanca's efforts to assign the licenses to the Partnership.

<sup>9</sup> On or about March 13, 2017 the Partnership revisited its earlier vote to acquire the Blanca licenses and again voted to acquire the Blanca Cellular licenses. However, during that meeting Verizon reiterated its threat to bring legal action to prevent that transaction. Ultimately, Verizon's threat of litigation, including the filing of objections with the FCC, bore fruit as the Partnership ultimately decided to forego the Partnership's opportunity to acquire the Blanca cellular licenses rather than risk the protracted litigation threatened by Verizon in the event that Blanca filed an application to assign the Blanca cellular licenses to the Partnership.

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March 30, 2017

Respectfully submitted,  
BLANCA TELEPHONE COMPANY

  
\_\_\_\_\_  
Timothy E. Welch

Its Attorney





December 14, 2016


Alan Wehe  
Blanca Telephone  
129 Santa Fe  
Alamosa, CO 81101

Dear Blanca Telephone; Alan Wehe

In compliance with the FCC docket #94-102 wireless carriers are to provide Phase I & II wireless 9-1-1 service within six months of a request from a 9-1-1 authority. This is our official request for you to implement Phase I and Phase II service in our territory.

The next regular meeting is scheduled on January 31<sup>st</sup> at 6:00 p.m., if you would like to attend to address the request for Phase 1 & 2 implementation.

I am looking forward to working with you on this project.

Sincerely,  
  
Pamela Stewart  
PSAP Administrator  
San Luis Valley E911 Authority

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**From:** Hickey, Bill A <Bill.Hickey@VerizonWireless.com>  
**Sent:** Wednesday, September 7, 2016 12:30 PM  
**To:** Tim Welch  
**Cc:** Jackman, Steven; Karia, Ketan; james.massey@verizonwireless.com; jrcaplinger@caplinger.net; Catherine Moyer; Wehe Alan; ahoopes@silverstar.net  
**Subject:** RE: [E] Re: CO-7 LP Acquisition of Blanca Cellular Licenses and Certain Assets and VZW Certain Assets

Tim,

It has been almost a year now in discussing the acquisition of Blanca's cellular operations. We have considered your proposal below but unfortunately do not have the appetite for further delays. As we explained on our calls in late August we believe that the only way to move forward with the transaction now, in light of the USF controversy, is with VZW as the buyer. Please let us know if Blanca wishes to proceed on this basis.

Regards,  
Bill



**William Hickey**  
Executive Director - Strategic Alliances  
Verizon Wireless  
One Verizon Way - VC52S-221  
Basking Ridge, New Jersey 07920-1097

908-559-5408 / office  
908-559-7129 / fax  
201-207-4944 / mobile  
bill.hickey@verizonwireless.com

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**From:** Tim Welch [mailto:welchlaw@earthlink.net]  
**Sent:** Thursday, September 01, 2016 11:08 AM  
**To:** Hickey, Bill A; Wehe Alan; ahoopes@silverstar.net  
**Cc:** Jackman, Steven; Karia, Ketan; Massey, James G; jrcaplinger@caplinger.net; Catherine Moyer; Tim Welch  
**Subject:** [E] Re: CO-7 LP Acquisition of Blanca Cellular Licenses and Certain Assets and VZW Certain Assets

Good morning,

Operating Agreement Extension: Blanca is currently providing the same Roaming service underlying the recently expired operating agreement. Blanca is offering to extend that agreement through January 31, 2017 (with a payment due for the lapsed period). There will need to be another 4 month cellular switch maint. agreement too. Please let us know your thoughts.

Tim

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**From:** Tim Welch  
**Sent:** Monday, June 20, 2016 10:25 AM  
**To:** Hickey, Bill A ; Wehe Alan ; [ahoopes@silverstar.net](mailto:ahoopes@silverstar.net)

**Cc:** Jackman, Steven ; Karia, Ketan ; [james.massey@verizonwireless.com](mailto:james.massey@verizonwireless.com) ; [jrcaplinger@caplinger.net](mailto:jrcaplinger@caplinger.net) ; Catherine Moyer ; Tim Welch  
**Subject:** Re: CO-7 LP Acquisition of Blanca Cellular Licenses and Certain Assets and VZW Certain Assets

Good morning,

We have some rough pricing for the antennas mounted on a Blanca tower. I think to be certain we would need to know how many antennas are going up and where, but for discussion purposes we can ballpark \$300/mo. per PCS/cellular/700 MHz-style xmit/receive antennas and \$500/mo. per dish-style antenna. Not sure about tower loading issues. I think the Partnership would/should be responsible for addressing that? If the process is taking down antennas and replacing them, there shouldn't be too much of a concern, but it's probably something that needs to be addressed especially if antenna are being added to the towers.

Tim

**From:** Tim Welch  
**Sent:** Friday, June 17, 2016 11:42 AM  
**To:** Hickey, Bill A ; Wehe Alan ; [ahoopes@silverstar.net](mailto:ahoopes@silverstar.net)  
**Cc:** Jackman, Steven ; Karia, Ketan ; [james.massey@verizonwireless.com](mailto:james.massey@verizonwireless.com) ; [jrcaplinger@caplinger.net](mailto:jrcaplinger@caplinger.net) ; Catherine Moyer ; Tim Welch  
**Subject:** Re: CO-7 LP Acquisition of Blanca Cellular Licenses and Certain Assets and VZW Certain Assets

Thanks Bill.

We are reviewing the extension agreement, I think it looks ok.

My understanding is that each of the repeaters cost about \$50,000; so we were thinking that \$5k ea. = \$20k for all four repeaters. Is that acceptable?

Question about your site listing for Blanca: Blanca has two San Luis sites, one north of San Luis and one South of San Luis (an old AT&T microwave site). Are you interested in both sites? Or just one? If it's just one, maybe you could give us the coords so we know exactly which one you are referring to?

Tim

**From:** Hickey, Bill A  
**Sent:** Thursday, June 16, 2016 6:49 PM  
**To:** Wehe Alan ; [ahoopes@silverstar.net](mailto:ahoopes@silverstar.net) ; Tim Welch  
**Cc:** Jackman, Steven ; Karia, Ketan ; [james.massey@verizonwireless.com](mailto:james.massey@verizonwireless.com) ; [jrcaplinger@caplinger.net](mailto:jrcaplinger@caplinger.net) ; Catherine Moyer  
**Subject:** CO-7 LP Acquisition of Blanca Cellular Licenses and Certain Assets and VZW Certain Assets

Alan , Tim, and Allen

Attached is the extension agreement from Colorado 7 Limited Partnership for Allen Hoopes to execute for Sand Dunes Cellular Inc. as GP of Sand Dunes Cellular of Colorado Partnership as GP for Colorado 7 – Saguache LP. Alan Wehe to execute for Blanca . As we discussed on Wednesday we would like to target August 1<sup>st</sup> for VZW management of the cell sites with Blanca continuing to provide switching services while our network team works on the conversion of the system to the VZW switch.

**The following is the tentative plan that I will confirm next week with our network team:**

1. CO-7 LP would acquire the two cellular licenses for \$108,000.

2. Blanca Sites to be leased by CO-7 long term:
  - a. Fort Garland cell site-- Lease Tower Space and Ground from Blanca. --- **Blanca Telephone owns the tower and the land**
  - b. San Luis South cell site-- We believe you call this AT&T site. Lease Tower and Ground space from Blanca. - **Blanca Telephone owns the tower and the land**
  - c. Capulin Cell Site - Lease Tower Space and Ground space from Blanca **Blanca Telephone owns the tower and the land**
  - d. Blanca Repeater -- We would acquire equipment and Lease Tower and Ground space from Blanca. - **Blanca Telephone owns the tower and the land**
  - e. Manassa Repeater -- We would acquire equipment and Lease Tower from Blanca. Please provide contact information for the land owner. - **Blanca Telephone owns the tower. the land is owned by North Conejos school**
3. Blanca Sites to be leased by CO-7 short term until conversion to VZW switch.
  - a. San Luis cell site
  - b. Antonio cell site
  - c. La Jara Repeater
  - d. Sanford Repeater (**I need to double check with network on whether this is long term**)
4. CO-7 LP would acquire the assets and leases for the following VZW sites:
  - a. San Luis site on air December 2015
  - b. Blanca site on air December 2015
  - c. Antonito site -- Construction in Progress (I believe we did not discuss the CIP sites on Wednesday)
  - d. La Jara site -- Construction in Progress
5. Blanca would continue to provide the switching for the Blanca system up to a year or until conversion if earlier. VZW as manger for CO-7 LP would begin the work of replacing the cellular network with used CDMA equipment and adding LTE equipment following signing (hopefully August 1<sup>st</sup>).
6. If we cannot file a Pro-Forma assignment of the Blanca licenses to CO-7 LP, the Partnership will sign a pre closing spectrum manager lease with Blanca.

Items to be completed: (**Some of the steps below are still subject to legal review but I thought I would move the discussion forward**)

**VZW To Dos:**

1. Provide sales price of equipment and related lease costs for the following sites by June 24<sup>th</sup>.
  - a. San Luis site on air December 2015
  - b. Blanca site on air December 2015
  - c. Antonito site -- Construction in Progress
  - d. La Jara site -- Construction in Progress
2. Amend the 700 MHz lease to include the Blanca territory so it is ready for execution by July 31<sup>st</sup>.
3. Draft Amendments to the Partnership Agreements for both CO-7 and CO-9 so they are ready for execution by July 31<sup>st</sup>.
4. VZW Network to Contact Alan Wehe by June 24<sup>th</sup> to conduct site visits and any environmental testing necessary. Work to be completed for execution of documents by July 31<sup>st</sup>.
5. Revisit the Due Diligence Request list and discuss with Alan Wehe any open items.

**Blanca To Dos:**

1. Provide sales price of repeaters to CO-7 LP by June 24<sup>th</sup>.

2. Provide lease costs for both long term and short term locations by June 24<sup>th</sup>.
3. Provide backhaul costs to the Blanca switch and switching costs for the period August 1<sup>st</sup> to the conversion date to VZW switch (estimated to be up to a year).

I realize this is not an exhaustive list but it's a start. I will be out of the office Friday and Monday . I'll be checking voicemails periodically.

Have a good weekend.

Regards,  
Bill



**William Hickey**  
Executive Director - Strategic Alliances  
Verizon Wireless  
One Verizon Way - VC52S-221  
Basking Ridge, New Jersey 07920-1097

908-559-5408 / office  
908-559-7129 / fax  
201-207-4944 / mobile  
[bill.hickey@verizonwireless.com](mailto:bill.hickey@verizonwireless.com)

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**From:** Stewart - CDPS, Pamela <pamela.stewart@state.co.us>  
**Sent:** Tuesday, November 17, 2015 10:45 AM  
**To:** Hightower, William A  
**Cc:** Jackman, Steven; Hickey, Bill A; alanwehe@gojade.org; welchlaw@earthlink.net; Sherwood, Susan  
**Subject:** Re: Blanca Telephone 911 extension request

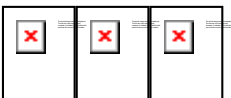
The San Luis Valley E911 Authority Board has send the information to David Seihl with the FCC advising that we are going to discontinue the complaint with the FCC in reference to Alan Wehe, Blanca telephone and the lack of Phase II information.

We have requested that the Phase II complaint be discontinued in order for Verizon and Alan Wehe, Blanca Telephone to enter into a business deal, improving the Verizon coverage within the San Luis Valley.

The San Luis Valley 911 Authority Board is looking forward to working with Verizon and expect that this decision will allow Verizon to move forward, and update equipment which will allow PhaseII information to be provided to the 911 center. We sincerely hope that is will be much sooner than the 2017 date specified.

**Pamela Stewart**  
Regional Manager  
Colorado State Patrol  
3110 1st Street Alamosa, CO 81101  
C 719-588-0310 O 719-587-6712  
F 719-589-1611  
email [pamela.stewart@state.co.us](mailto:pamela.stewart@state.co.us)

my email has changed [pamela.stewart@state.co.us](mailto:pamela.stewart@state.co.us) please update your address book



Under Colorado's Open Records Act (CORA), all e-mails sent by or to me on this state-owned e-mail account may be subject to public disclosure.

On Mon, Nov 9, 2015 at 10:05 AM, Hightower, William A <[William.Hightower@verizonwireless.com](mailto:William.Hightower@verizonwireless.com)> wrote:

Ms. Stewart, per our conversation Verizon Wireless is in discussions with the Blanca Telephone Company in regards to the potential acquisition of their wireless assets in areas around Alamosa. The Blanca representative voiced concerns about meeting your PSAPs Phase 2 request in that upgrading the existing towers to be Phase 2 compliant was cost prohibitive and the intent was to turn the network down by the end of November.

The alternative we discussed would be to allow the network to remain as is while we are working to negotiate and complete a transaction to avoid a loss of the current service level and coverage provided. To that end we would ask that an extension be granted to Blanca Telephone until 7/31/17. Provided a transaction is consummated between the parties Verizon Wireless will immediately begin the process of establishing connectivity from our facilities to the acquired sites and at that time we will be able to deploy these sites as Phase 2 in compliance with our current service agreement with your PSAP.

Blanca Telephone Company representation has been CC'd here.

Thanks,

Will Hightower  
Engineer III Consultant

Network Engineering & Operations



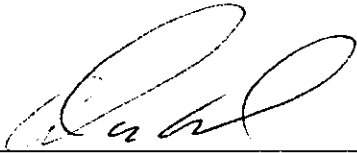
Ofc: [770-797-1287](tel:770-797-1287)

Fax: [770-797-1037](tel:770-797-1037)

Email: [william.hightower@verizonwireless.com](mailto:william.hightower@verizonwireless.com)

### **Certification**

I hereby certify under penalty of perjury that I have read the foregoing *Second Motion for Leave to Supplement Emergency Application for Review and Notice of Discontinuation of KKKQ427/KNKR288 Cellular Service* and that the facts stated therein are true and correct to the best of my knowledge information and belief.

A handwritten signature in black ink, appearing to read 'Alan Wehe', is written over a horizontal line.

Alan Wehe, President  
Blanca Telephone Company

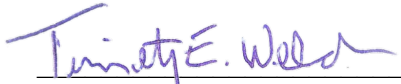
March 29, 2017



### Certificate of Service

I hereby certify that I have this 30th day of March 2017 served a copy of the foregoing *Second Motion for Leave to Supplement Emergency Application for Review and Notice of Discontinuation of KNKQ427/KNKR288 Cellular Service* by First Class United States Mail, postage prepaid, upon the following:

Mark Stephens  
Managing Director  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

  
\_\_\_\_\_  
Timothy E. Welch