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December 19, 2016

VIA ECFS

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Application of AT&T Mobility Spectrum LLC and Rainbow Telecommunications Association, Inc., for Consent to Assign a Lower 700 MHz C Block License (WT Docket No. 16-111)

Dear Ms. Dortch:

Rainbow Telecommunications Association, Inc. ("Rainbow") hereby responds ("Response") to the Wireless Telecommunications Bureau's ("Bureau") General Information Request ("Request"), dated December 5, 2016, in the above-captioned proceeding, to Rainbow.

As directed by the Request and the Protective Order adopted in this proceeding, two unredacted copies of the Response are being filed by hand with Kathy Harris of the Bureau. One unredacted copy of the Response is also being filed with the Secretary's Office.

Copies of the redacted submission have been filed via ECFS and distributed to the Commission personnel designated in the Request.

Please direct any questions to the undersigned.

Respectfully submitted,

Todd B. Lantor
Counsel to Rainbow Telecommunications Association, Inc.

cc: Kathy Harris (unredacted (via hand delivery) and redacted versions (via e-mail))
Kate Matraves (redacted version via-e-mail)
Jim Bird (redacted version via e-mail)

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December 19, 2016

REDACTED – FOR PUBLIC INSPECTION

VIA HAND DELIVERY

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

Re: Application of AT&T Mobility Spectrum LLC and Rainbow Telecommunications Association, Inc. for Consent to Assign a Lower 700 MHz C Block License (WT Docket No. 16-111)

Dear Ms. Dortch:

Rainbow Telecommunications Association, Inc. ("Rainbow"), a Kansas cooperative, by its attorney, hereby responds to the Wireless Telecommunications Bureau's ("Bureau") General Information Request, dated December 5, 2016 ("Request").[1] The Request seeks information to assist the Bureau to complete its review of the application in the above-referenced proceeding.

The Request calls for Rainbow to submit certain information sensitive from a commercial, competitive and financial perspective, and that Rainbow would not reveal in the ordinary course of business to the public or its competitors. Rainbow is submitting information on a Highly Confidential basis under the Protective Order issued in this proceeding on December 5, 2016. Any inadvertent inclusion of material subject to an assertion of the attorney-client attorney work-product, or other applicable privilege is not intended as a waiver of such privilege. Rainbow requests that any privileged material inadvertently produced be returned to Rainbow when such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such material.

In the public version of the Response, Rainbow has redacted Highly Confidential Information and marked the redactions with "**[BEGIN RAINBOW HIGHLY CONFIDENTIAL INFORMATION] … [END RAINBOW HIGHLY CONFIDENTIAL INFORMATION].**"

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[1] Letter from Jon Wilkins, Chief, Wireless Telecommunications Bureau, to James Lednicky, Rainbow Telecommunications Association, Inc., WT Docket No. 16-111 (Dec. 5, 2016) and accompanying General Information Request.

The redacted Response is marked "**REDACTED – FOR PUBLIC INSPECTION**" and is being filed electronically in the Commission's Electronic Comment Filing System ("ECFS"). The Highly Confidential, unredacted Response is marked "**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WT DOCKET NO. 16-111 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**" and is being delivered to the Secretary. Additional copies of the unredacted Response are being delivered as instructed in the Request.

RESPONSE

Request:

1. Explain in detail the decision made by Rainbow to partition and assign to AT&T the partitioned Lower 700 MHz C Block license that is the subject of this application, including any attempts made to enter into a sale of this spectrum or alternative arrangements with parties other than AT&T.

Response:

Founded in 1953 and headquartered in Everest, Kansas, Rainbow, a cooperative, serves several rural communities in northeast Kansas, including the communities of Horton, Hiawatha, Sabetha and Seneca and Rainbow is already operating on its Lower 700 MHz C Block spectrum outside of Leavenworth County. **[BEGIN RAINBOW HIGHLY CONFIDENTIAL INFORMATION]**

[END RAINBOW HIGHLY CONFIDENTIAL INFORMATION]

Kansas-5 (CMA 432) consists of the following five Kansas counties: Atchison, Brown, Doniphan, Jackson and Leavenworth. Leavenworth County is very different from the other four Kansas-5 counties on a number of levels. Leavenworth County is the sixth most-populated county in Kansas and the only one of the five Kansas-5 counties that is considered part of the Kansas City, MO-KS Metropolitan Statistical Area. According to the U.S. Census, Leavenworth County has an estimated population of 79,315 people and a population density of 165 people per square mile. In contrast, collectively, the counties of Atchison, Brown, Doniphan and Jackson have a population of only 47,309 people and a population density of approximately 23 per square mile.

As a rural cooperative actively involved in the rural communities that it serves in northeast Kansas and in providing the best technology, customer service and community involvement to these rural communities, **[BEGIN RAINBOW HIGHLY CONFIDENTIAL INFORMATION]**

[END RAINBOW HIGHLY CONFIDENTIAL INFORMATION] and the two companies subsequently filed an assignment application with the FCC for approval of the assignment on February 19, 2016.

Please direct any questions to the undersigned.

Respectfully submitted,

Todd B. Lantor
Counsel for Rainbow Telecommunications Association, Inc.

cc: Kathy Harris (via hand delivery)