

1 A Since we hired some outside firms to take care of
2 the licenses, I would say about 95-96 percent was all
3 engineering. Maybe two or three percent was spent on the
4 licensing.

5 Q Now, tell me who -- from the time you got to
6 Liberty, can you tell me who your supervisors have been?

7 A I started with Bruce McKinnon was the actual
8 Liberty person who hired me at the recommendation of Joe
9 Stern. And after he left, I was reporting to Tony Ontiveros
10 and Peter Price after Bruce McKinnon left.

11 Q Do you remember about when Bruce McKinnon left?

12 A Bruce McKinnon left somewhere in the middle of
13 '93.

14 Q Okay. So from '93 to April of '95, you were being
15 supervised by Mr. Price and Mr. Ontiveros?

16 A That is correct.

17 Q Now, we've been talking a lot about licenses. Did
18 Liberty need a license to -- to transmit on the 18 gigahertz
19 part of the spectrum?

20 A That's correct.

21 Q Okay. And what actually was being licensed by the
22 FCC?

23 A For the private 18 gigahertz band, only the
24 transmitters are licensed per path.

25 JUDGE SIPPEL: Just a minute. Does the Reporter -

1 - is he familiar with that term? Did you talk to him about
2 this gigahertz?

3 MR. BEGLEITER: Yes. As a matter of fact, he even
4 --

5 JUDGE SIPPEL: GHz?

6 MR. BEGLEITER: We've been talking about the
7 spelling, Your Honor.

8 JUDGE SIPPEL: Okay. Go ahead.

9 MR. BEGLEITER: He's been writing it out, G-I-G-A.
10 You can abbreviate it GHz.

11 THE COURT REPORTER: I'm also familiar with the
12 abbreviation.

13 JUDGE SIPPEL: Okay. Go ahead.

14 BY MR. BEGLEITER:

15 Q Okay. You say transmitters needed licensing --
16 paths from transmitters needed licenses? Is that --

17 A That's correct.

18 Q Okay. And what is an STA, Mr. Nourain?

19 A Could you repeat that?

20 Q What is an STA, Mr. Nourain?

21 A It is a special temporary authority to obtain --
22 to give you authorization to turn the system on until you
23 get the final license.

24 Q Was it your understanding in '94 and '95 that if
25 you had a -- that if Liberty was granted an STA, it could

1 transmit along a certain frequency?

2 MR. HOLT: Objection. Leading.

3 JUDGE SIPPEL: That's --

4 MR. BEGLEITER: Was it your understanding?

5 JUDGE SIPPEL: This is really the mechanical
6 instruction. I don't think we're really testing this
7 Witness' ability to understand the technical aspects. We're
8 trying to find out what he does. I'll allow it.

9 THE WITNESS: Could you repeat the question again?

10 BY MR. BEGLEITER:

11 Q Was it your understanding in 1994 and 1995 that
12 Liberty could transmit if it obtained an STA?

13 A That's correct.

14 Q Now, Mr. Nourain, the next series of questions are
15 going to be concerned with your responsibilities and the
16 licensing process at Liberty in 1994 and the first
17 approximately half of 1995. Okay, Mr. Nourain? How would
18 the license -- what would be the first indication to you
19 that Liberty needed a license for its certain path?

20 A Well, since I was the only engineer in the
21 company, I was also -- would act as an application engineer.
22 So I was involved in the pre-sales, working with the
23 marketing. So the first thing was that if marketing would
24 come up with a projected building that needs to be activated
25 or there's a customer there that was -- that had any

1 interest in the building, then I would start with a survey
2 of the building after their request.

3 Q Can you describe to the Judge the survey --

4 JUDGE SIPPEL: Can I just ask -- interject here a
5 question? And that is he's the only engineer and he's
6 testified to that.

7 MR. BEGLEITER: Right.

8 JUDGE SIPPEL: But are there any other people who
9 assist him in his engineering function there?

10 BY MR. BEGLEITER:

11 Q Let me ask it this way. From the years 1993, '94,
12 '95, was there anyone who assisted you in your engineering
13 function?

14 A Well, yes. Assistant means -- I had two
15 technicians, Your Honor. And those technicians were not
16 engineers. They were not technically. If there were like
17 one site server there, you have to go there and see if the
18 two buildings are next to each other. At the time, I would
19 send them to take a look at that -- those buildings to see
20 if they have a line of site. But that would be as much as
21 they would assist. The technical part of it, how to
22 calculate it, how to make sure the system and the network
23 applied to that particular path, no, there was nobody there
24 but myself.

25 JUDGE SIPPEL: Well, what happens when you go on

1 vacation or when you get sick?

2 THE WITNESS: If I go on vacation, I would
3 generally -- wouldn't go on a long vacation. The vacation
4 would take about maybe three or four days. And it has
5 happened during those times that if there were a few surveys
6 which were really critical, they would wait until I come
7 back.

8 JUDGE SIPPEL: All right.

9 BY MR. BEGLEITER:

10 Q Can you just describe -- well, actually, his last
11 question reminded me of something. When you say that Tony -
12 - withdrawn. In the years 1994, 1995, did anybody supervise
13 you on a day-to-day basis in your engineering?

14 A No.

15 Q Essentially, you were on your own?

16 A That's correct.

17 Q And we started out with the survey. Can you
18 explain to the Judge what a survey is?

19 A Well, the application of 18 gigahertz that I was
20 working at, it's a point-to-point application. You have to
21 have a direct line of site between your transmitter and the
22 receiver locations. And that has to be definitely
23 determined first. And that was a part of it.

24 And at that point, after that was determined, then
25 you have to do the engineering study because you're working

1 on a dynamic system which has to be applied for a stationary
2 transmitter to various receivers. So you have to design it
3 properly to make sure there is also capacity in the system
4 to be applied for another customer on a later date. So
5 there's a technical part of it and just outside survey part
6 of it.

7 Q Is that -- is that survey designed to ensure that
8 the signal can go to the -- can go to the building that's
9 being activated?

10 A That's correct.

11 Q Mr. Nourain, at the beginning of -- at the
12 initiation of the application process -- withdrawn. You
13 talked about coordination. Can you tell me what a
14 coordination is?

15 A Well, the coordination is that for every system
16 that you are installing and you are applying for license,
17 you have to have a geographic coordination. By
18 coordination, I mean a geographic coordination. You have to
19 have the latitude and longitude of the particular location
20 all obtained and be extracted from the geographic map. And
21 after that, you do the -- based on those coordinations of
22 the transmitter and the receiver, you get the length of the
23 path. The length of the path is a very important technical
24 part of this application, to make sure that your design is
25 proper.

1 So by coordination, that's what I meant. Also for
2 clearing the frequency and doing the -- you know, for
3 instance, you have to have the coordination in addition to
4 the height of the buildings and where you're going to put
5 your antennas. And those are all the datas that goes with
6 the coordination to be submitted to the search for
7 interference to the system.

8 Q What is the purpose of doing the survey?

9 A To make sure that you are not interfering with any
10 users in the -- which has a -- which has authority to use
11 that particular band. So that's -- something that has to be
12 done for interference study purpose -- that you're not
13 interfering with anybody and that nobody interferes with us.

14 Q In the issue of Liberty, has anybody claimed that
15 Liberty's signal interfered with anybody else's signal?

16 A No, nobody else uses that system in New York.

17 Q Okay. Now, you do this coordination. Do you do
18 it yourself or do you do it with somebody else?

19 A The coordination technical study, I do it myself.

20 Q Okay. And what do you do with the study after you
21 finish it?

22 A After I finish the study, of course that -- all
23 these discussions are with the assumption that we are going
24 to -- I was authorized to go ahead and get the license for
25 the path because they were -- sometimes the survey was

1 completed, but it was just as a preliminary survey to make
2 sure that can the certain building be activated as far as
3 the marketing part of it was concerned.

4 But the assumption was that I was -- I was
5 authorized to -- I mean I was told we need to probably
6 license a certain path. Then after I got all the
7 information, I would pass that to the search firm called
8 COMSEARCH which dealt with coordination and interferences
9 study.

10 Q What exactly is a coordination interference study
11 that COMSEARCH would do?

12 A That's what I indicated a couple of questions ago
13 to make sure that we are not interfering with anybody.

14 Q Okay. And when you say you worked with -- did you
15 work with COMSEARCH on this study?

16 A I would provide them with all the data sheets.
17 They have a database and computer of their own. That's what
18 part of the job was. They have to have to do all these
19 studies. And at that point, they will send the information
20 back to me for technical review. And after I was approving
21 the technical review, then it was ready to go for filing.

22 Q Okay. And tell me, who would -- and who was the
23 law firm that would do the application filing for Liberty at
24 this -- in this period --

25 A Pepper & Corazzini.

1 Q And who would send the -- the results of this
2 coordination study to Pepper & Corazzini -- withdrawn. Did
3 anyone have to -- in order for Pepper & Corazzini to file
4 for the license, was it necessary for Pepper & Corazzini to
5 have this coordination study in its hands?

6 A Yes.

7 Q Okay. And who would send the coordination study
8 to Pepper & Corazzini in 1994 and '95?

9 A I -- as part of the procedure, I instructed
10 COMSEARCH to send a copy or fax a copy right away to Pepper
11 & Corazzini after I reviewed this technical part of it and I
12 knew that everything was right, send it to them for filing.

13 JUDGE SIPPEL: Well, was there a part of what
14 COMSEARCH was sending to Pepper & Corazzini that you did not
15 review?

16 THE WITNESS: That -- yes, it was. At the time,
17 it was not. But after they -- after they sent all the
18 information to COMSEARCH -- to Pepper & Corazzini to be
19 filed, there was another portion called supplemental showing
20 which they would send that after a certain time that they
21 would send the actual study out for coordination process --
22 the coordination process to get done, they will send it
23 back. That supplemental showing, they will send that
24 directly to Pepper & Corazzini.

25 JUDGE SIPPEL: Okay. Well, I don't want to

1 interfere with you on that.

2 MR. BEGLEITER: Go ahead.

3 JUDGE SIPPEL: Do you know about this supplemental
4 -- what is a supplemental showing? What's in there?

5 THE WITNESS: Okay. The supplemental showing is
6 nothing but the list of the users within the area -- all the
7 users within 200 miles that it would be generated after
8 the -- a part of the COMSEARCH process was to send this data
9 after I review it outside to make sure nobody has objected
10 to that, all the users within a certain area. And after
11 they finished an objection to that, they would give them a
12 certain time, 15 to 20 days to go over that. And at that
13 point, it would be ready to go to that supplemental showing
14 to be filed.

15 JUDGE SIPPEL: But you had nothing to do with the
16 supplemental showing. In other words, they wouldn't put
17 this -- the supplemental showing would not come to you for
18 you to look at before it went to the attorneys.

19 THE WITNESS: No, sir. It's -- it's just a
20 routine thing that it would just go back. All the -- it was
21 nothing but a technical part of the path which we know that
22 it's the same and also a list of the users. So the
23 supplemental showing was always the same.

24 JUDGE SIPPEL: Well, I mean, now you're going a
25 little bit too fast for me. The supplemental showing is the

1 list of the users?

2 THE WITNESS: They are the list --

3 JUDGE SIPPEL: And anything else?

4 THE WITNESS: It's a list of the users, emission
5 designator, the -- all the -- every equipment has to be
6 registered by government as a -- as a -- some kind of a
7 number. So the transmitter that we're using has a certain
8 number and all the paths. And those are just a routine list
9 that they have to be inserted into the filing application.
10 And that is the part that is always the same.

11 MR. BEGLEITER: Your Honor, this may clear it up.

12 BY MR. BEGLEITER:

13 Q Mr. Nourain, could you please turn -- there's a
14 thick volume in front of you -- to the -- what follows from
15 Tab 25. I'd like to skip the first three pages for the
16 moment. We'll get back to them later. And I'd like --
17 there's a page which has small numeral 004 at the bottom.
18 Do you see that page, Mr. --

19 A I am on File 25.

20 Q All right.

21 A What's the next?

22 Q I'd like you to go -- to the fourth page.

23 A Yes.

24 Q Okay. And I'd like you to -- is -- do you
25 recognize this Number 25 as -- as a license application to

1 the FCC?

2 A Yes, that's the license application.

3 Q Okay. And on the third page, that's your
4 signature?

5 A Yes.

6 Q Go to page 4. And I'd like you to explain to the
7 Judge which -- which documents COMSEARCH provides for the
8 application and what they are, okay?

9 A The page 4?

10 Q 004 at the bottom.

11 A 004 is the data sheet that I described with all
12 the technical information I will send to COMSEARCH. They
13 study it and send it back for me to review.

14 Q This information comes from you?

15 A Yes.

16 Q Okay.

17 JUDGE SIPPEL: Everything on page 4?

18 THE WITNESS: That's right. With the exception of
19 initial designator, loading stability. Those are the ones
20 that already have been done by the manufacturer and has
21 been, you know, licensed by the manufacturer to sell those
22 equipment.

23 BY MR. BEGLEITER:

24 Q So that would have come from Hughes Aircraft?

25 A Exactly. Everything on the right side which

1 regards to the receiver such as on top, it says, "Path
2 Report", all those data which includes the latitude,
3 longitude, grounding, type of antenna, height and all the
4 levels of the power levels and losses engaged, those come
5 from me and also on the right side. Except for equipment,
6 all the other data will come from me.

7 Q Okay. And I'd like you to turn now -- and would
8 the same be true of page 5?

9 A That's correct.

10 Q Okay. And page 6?

11 A Yes.

12 Q Okay. And page 7, do you know what that page is,
13 sir?

14 A Yes. That is again -- it was part of these -- it
15 again shows the -- pretty much some of my information and
16 some of the manufacturer's information. Transmitter
17 information which tells that what -- the antennas is all
18 constant to manufacturer information. And the calculation
19 that would have been done as a result of my data provided to
20 COMSEARCH.

21 Q Okay. And would the same be -- would you
22 explanation also be true at pages 8, 9 and 10?

23 A 8, 9 and 10, yes.

24 Q Okay.

25 A Every one of those.

1 Q Okay. And then would page 11 -- what is that page
2 and who provides it?

3 A That -- that's again -- it's part of the
4 COMSEARCH.

5 Q So COMSEARCH provides this information.

6 A Yes, because that tells that this particular
7 transmitter has 72 channels under 18 gigahertz path. Under
8 18,145 to 18,421, and those are the 72 channels which are --
9 actually, this microwave system is incapable of transmitting
10 72 video channels for the cable providers. So that is --
11 give you that and also the initial designator which is
12 something which is registered I'm assuming by the government
13 that could use that.

14 Q Would you go to page 13, sir?

15 A Yes.

16 Q And who provides that information?

17 A That information also provides by COMSEARCH and
18 Pepper & Corazzini.

19 Q But not by you?

20 A Not by me, no.

21 Q And what -- this shows -- the functional system
22 diagram is self-explanatory.

23 A It's just based on what they are see on that
24 particular four or five paths, all the directions look like.

25 Q Okay. And number 14, who provides that, if you

1 know?

2 A I don't recall that. I know what it is. I don't
3 know whether it is a COMSEARCH or Pepper & Corazzini.

4 Q Okay. And page 15 through page 22, what are those
5 pages?

6 A That's what Your Honor was referring to. Page 16,
7 all those addresses of those people they send out. Those
8 are part of the supplemental showing it indicates on top.

9 JUDGE SIPPEL: It's all under the heading of
10 COMSEARCH.

11 THE WITNESS: That's correct.

12 BY MR. BEGLEITER:

13 Q And COMSEARCH does that. Okay.

14 A That was the one that --

15 Q And on page 23, there's a document that says,
16 "Supplemental Showing."

17 A That's correct. In addition to those pages prior
18 to that.

19 Q And this is also provided by COMSEARCH.

20 A That is correct.

21 Q All right.

22 A All the company's -- that information list.

23 Q And I think we've gone through the entire
24 application if you go to page 34. It's all the supplemental
25 showing. Now, Mr. Nourain --

1 A Yes.

2 Q -- when COMSEARCH would send -- there would come a
3 time that you indicated before that COMSEARCH would send its
4 results to Pepper & Corazzini.

5 A Yes.

6 Q Okay. And would you be involved with the
7 application until this point, the point at which COMSEARCH
8 would complete its task?

9 A I was involved on making sure that they have --
10 they have coordinated those paths that I gave them and send
11 them back to me for review. At that point, I ask them to
12 fax those to Pepper & Corazzini for to start working on the
13 application. And as part of the job, part of the services
14 was to send those data sheets out to -- for the coordination
15 process.

16 Q Did you have any responsibility in your mind for
17 licensing after you did -- after those acts were completed?

18 A No.

19 Q Okay. Who did in your mind?

20 A Pepper & Corazzini.

21 Q Okay.

22 A That's what they were hired for.

23 Q Okay. And application -- if you go back to Number
24 25, Mr. Nourain --

25 MR. BEGLEITER: You see, I promised we'd go back

1 to that, Your Honor. Okay?

2 JUDGE SIPPEL: That's all right. Don't get ahead
3 of your lawyer. Let's let him ask the questions.

4 BY MR. BEGLEITER:

5 Q Your signature appears on the third page, is that
6 not correct?

7 A Yes, sir.

8 Q Now, I'm not going to ask about this specific
9 application. I'm going to ask about generally. In the
10 years 1994 until April of 1995, did you sign those
11 applications one at a time or in bulk?

12 A I signed this last page in bulk.

13 Q Were there blanks in the application when you
14 signed?

15 A I signed only this page.

16 Q You would sign --

17 A They were blank, yes.

18 Q Okay. Tell me why that was done.

19 A To expedite the process of filing because in my
20 understanding, all the applications since that was for the
21 transmitters and the transmitters were all the data which on
22 the first page was always constant. So my understanding is
23 that since this is all constant, so there's no need to
24 review that every time. So I would sign that because on
25 every application, the only changes are the technical part

1 which refers to COMSEARCH that we talked about. And those
2 are the part that I always review. So I send these bunch to
3 them to expedite the filing process.

4 JUDGE SIPPEL: Who is the them that you sent them
5 to?

6 THE WITNESS: Pepper & Corazzini.

7 BY MR. BEGLEITER:

8 Q Okay. So would you know -- would you be informed
9 by anyone at Pepper & Corazzini as to when it was filing a
10 specific license?

11 A They -- in general, their instruction was as soon
12 as they get the information from COMSEARCH, they start
13 getting the filing process completed and wait for the
14 supplemental and send that out right away. So at that
15 point, I did not follow that up, no.

16 Q Okay. And -- but they would send you a copy of
17 the license that they were applying to the FCC -- which they
18 were filing with the FCC, isn't that correct?

19 A They would send me the copy of? Sorry?

20 Q Of the license that they were filing with the FCC.

21 A Copy of the license? I did not get a copy of the
22 license.

23 Q Excuse me. I'm sorry. A copy of the license
24 application we're referring to.

25 A Yes, the application at some point they would send

1 them to me.

2 Q Okay. Would the copy of the license application
3 that you got have the FCC file number on it?

4 A It had some file numbers on it.

5 Q But the -- all right, yes.

6 JUDGE SIPPEL: I'm sorry to interrupt here, but I
7 want to be sure that I'm keeping up with what's going on
8 here and with this testimony.

9 MR. BEGLEITER: Sure.

10 JUDGE SIPPEL: The period of time that you were
11 signing in blank was from approximately when to when? Go
12 ahead. Tell me the years.

13 THE WITNESS: Well, the blank copies, I would -- I
14 would sign that during '94 and '95. But generally, I would
15 have done that in the past before that, too, as well.

16 JUDGE SIPPEL: All right. But there was a more of
17 a -- there was more of a need to do it that way in '94 and
18 '95? Were you getting -- in other words, was this work
19 being pushed on you at a faster pace going into '94 and '95
20 than earlier?

21 THE WITNESS: Well, that was the routine that we
22 were doing because overall my understanding was that the
23 process is going to take a certain time to do that and --

24 JUDGE SIPPEL: That's all right. I don't need to
25 know that. I just need to know that in terms of -- well,

1 your recollection in terms of your working in your office,
2 was -- did the pace seem to pick up that prompted to you
3 sign more and more of these in blank or was this just
4 signing them in blank what you did?

5 THE WITNESS: Well, no, it was just the latter.
6 It was just signing them in blank and sending them. That
7 way they would have them in the file whenever we needed to
8 file.

9 JUDGE SIPPEL: How many would you send in blank at
10 a time?

11 THE WITNESS: Maybe 20 or 25.

12 JUDGE SIPPEL: How would you know when you were to
13 send them in blank? I mean, how would you know when you
14 would put together 20 and then send them?

15 THE WITNESS: Whenever it was finished, the Pepper
16 & Corazzini will fax me a copy. And they told me that
17 they're finished with these -- these with my signature on
18 them. And then they will ask me to send them several of
19 them. And I would send as much as we can. And I would send
20 about -- sign that about 20 or 30 of them and send them to
21 them.

22 JUDGE SIPPEL: But there was -- was there -- was
23 there a pattern to this? Were you supposed to send them on
24 the third week of every month or only when they asked you to
25 send them a specific number of them?

1 THE WITNESS: Only when they asked for them. When
2 they were just about finished with them. And there were a
3 couple of signatures before they be run out of it. They
4 would ask me and I would sign it and send them back.

5 JUDGE SIPPEL: Okay.

6 BY MR. BEGLEITER:

7 Q Okay. Mr. Nourain, but you would receive -- if
8 you take a look at the first page of 25, is that a cover
9 letter where Pepper & Corazzini sent you copy of the
10 application?

11 A Yes, that' --

12 Q Okay. Tell me, what would you do with the copy of
13 the application when you received it in your office?

14 A This application were for various transmitters as
15 it indicates there. And I would just file them in that
16 transmitter file.

17 Q Okay. Did you keep track of the progress of the
18 application?

19 A No.

20 Q Did you have a specific file for every path?

21 A No. I had filing for every transmitters. Those
22 paths were inside of those transmitters, so I didn't see any
23 necessity.

24 Q So would it be correct to say that -- that on --
25 withdrawn. For each transmitter, was there just one path or

1 many paths?

2 A Each transmitter has many paths.

3 Q Okay. Would you keep track of which paths
4 received authorization?

5 A The authorization -- the authorization comes with
6 the -- for the transmitter itself.

7 Q Right.

8 A So whatever path is in there, it would be that.
9 But the authorization doesn't come for a path. It comes
10 with the transmitter which that path is a part of.

11 Q Well, isn't it true that every path requires an
12 authorization?

13 A Yes.

14 Q Okay. And I'm asking, did you keep track of the
15 authorizations that would allow you to transmit for each
16 path?

17 A No, I didn't keep track of that.

18 Q Okay. And this is again in '94 and '95?

19 A That's right.

20 Q Okay. And as far as you know, does Liberty now
21 keep track of those things?

22 A Yes.

23 JUDGE SIPPEL: Let me interrupt you again there,
24 Mr. Begleiter. When you say -- when you're asking a
25 question about authorization, is the authorization -- is

1 that a generic for license and/or STA or is authorization
2 something different than those two?

3 MR. BEGLEITER: Well, right now I think there are
4 three animals, Your Honor. There's the license; there's the
5 STA; and there's something called interim operating
6 authority. So I made a shorthand. And that's really just
7 for the purposes of this interim operating authority; is for
8 the purposes of this proceeding if I'm correct. Mr. Weber
9 is shaking his head. So I thought I would just use the term
10 to include all three.

11 JUDGE SIPPEL: All right.

12 MR. BEGLEITER: But I don't -- if that's confusing
13 --

14 JUDGE SIPPEL: Well, it is confusing in terms --
15 because I thought your questions were going as to how did he
16 organize his files.

17 MR. BEGLEITER: Right.

18 JUDGE SIPPEL: And that's what I was trying to
19 focus on. And he said he did it on a transmitter basis.
20 But he would get the applications back from Pepper &
21 Corazzini and then file them on the transmitter basis.

22 MR. BEGLEITER: Right.

23 JUDGE SIPPEL: Is that what you testified to?

24 THE WITNESS: That's correct.

25 JUDGE SIPPEL: And I'm trying to just follow in

1 terms of what's being -- what it is; what is this
2 authorization that's being filed.

3 MR. BEGLEITER: Okay. I think we should
4 straighten that out.

5 BY MR. BEGLEITER:

6 Q During your tenure at Liberty from '92 to '95,
7 were licenses granted?

8 A Yes.

9 Q Okay. And can you -- let's see. Can you take a
10 look at the thinner volume, lucky 13.

11 A I have up to 12 here.

12 MR. BEGLEITER: Wasn't 13 admitted, Your Honor?

13 JUDGE SIPPEL: Yes. Hold it just a second. I
14 know. Yes, but there's no tab. That didn't come in as a
15 tabbed item. I have 13 right here.

16 MR. BEGLEITER: Okay.

17 JUDGE SIPPEL: You can use my copy. Here you go.

18 THE WITNESS: Thanks.

19 BY MR. BEGLEITER:

20 Q And is that a license that Liberty -- is Exhibit
21 13, Liberty/Bureau here, is that a license that Liberty
22 actually received?

23 A Yes.

24 Q And Liberty received several of these licenses?

25 A Yes.

1 Q Okay. And did you have a file for licenses?

2 A Yes.

3 Q Okay. And another way of Liberty receiving
4 authorization was through STAs, is that correct?

5 A That's correct.

6 Q And tell me, sir, how would you receive the STA?
7 Who would send it to you?

8 A It would have -- the STAs come by the Commission.

9 Q Okay. And what would you do with those STAs after
10 you got them?

11 A I would file them.

12 Q And where would you file them?

13 A File them in the same files that the applications
14 are.

15 Q Okay. And in that file, by the way, wouldn't
16 there be other -- other materials?

17 A The files -- yes, there were other materials
18 related.

19 Q And did you track -- actually sit down and track
20 to figure out which STAs you had received for which paths?

21 A Well, the STAs that come in doesn't have the path
22 addresses on them. It just comes again with a file number.
23 So I would just look at them. And it was a stamp that the
24 STA was authorized.

25 Q But I assume that if you -- I assume that if you