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REDACTED – FOR PUBLIC INSPECTION

January 5, 2015

VIA ECFS

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

RE: Application of AT&T Mobility Spectrum LLC and Consolidated Telephone Company for Consent To Assign Licenses (WT Docket No. 14-254)

Dear Ms. Dortch:

On behalf of Consolidated Telephone Company (“Consolidated”), attached is the public version of the response (“Response”) to the Wireless Telecommunications Bureau (“WTB”) General Information Request dated December 11, 2014 (“Request”). Pursuant to the Request and the Joint Protective Order in this proceeding, this public version of the Response has been redacted for public inspection. The unredacted confidential version of the Response is being delivered today to your office under separate cover and, to the WTB.

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
January 5, 2015
Page 2 of 2

Please direct any questions regarding this Response to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Whiteaker', with a long horizontal flourish extending to the right.

Gregory W. Whiteaker
Counsel for Consolidated Telephone Company

Enclosure

cc (via email): Kathy Harris
Scott Patrick
Kate Matraves
Jim Bird
TransactionTeam@fcc.gov

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REDACTED – FOR PUBLIC INSPECTION

January 5, 2015

VIA HAND DELIVERY

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

Re: Application of AT&T Mobility Spectrum LLC and Consolidated Telephone Company for Consent To Assign Licenses (WT Docket No. 14-254)

Dear Ms. Dortch:

Consolidated Telephone Company (“Consolidated”) hereby responds (the “Response”) to the Wireless Telecommunications Bureau (“WTB”) General Information Request dated December 11, 2014 (“Request”).¹ The Request seeks information to assist the Federal Communications Commission (“FCC” or “Commission”) to complete its review of the application in the above-referenced proceeding.

The Request calls for Consolidated to submit certain information that is sensitive from a commercial, competitive, and financial perspective, and that Consolidated would not reveal in the ordinary course of business to the public or its competitors. Consolidated is submitting information on a Highly Confidential basis pursuant to the Joint Protective Order issued in this proceeding on December 11, 2014. The inadvertent inclusion of any material that is subject to an assertion of the attorney-client, attorney work-product, or other applicable privilege is not intended as a waiver of such privilege. Consolidated requests that any privileged material inadvertently produced be returned to Consolidated as soon as such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such material.

¹ Letter from Roger C. Sherman, Chief, Wireless Telecommunications Bureau, to Kevin T. Larson, Consolidated Telephone Company, WT Docket No. 14-254 (Dec. 11, 2014) and accompanying General Information Request.

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
January 5, 2015
Page 2 of 4

In the public version of the Response, Consolidated has redacted Highly Confidential Information and marked the redactions with “[BEGIN CONSOLIDATED HIGHLY CONFIDENTIAL INFORMATION] . . . [END CONSOLIDATED HIGHLY CONFIDENTIAL INFORMATION]”. 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 ORDERS IN WT DOCKET NO. 14-254 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 Consolidated to assign the Lower 700 MHz C Block spectrum that is the subject of this application to AT&T, including any attempts made to enter into a sale of this spectrum or alternative arrangements with parties other than AT&T.

Response:

Consolidated is a rural incumbent local exchange carrier that, among other things, provides local telephone service, broadband Internet service, and digital television service in rural areas of central Minnesota. Consolidated also provides fixed wireless broadband Internet access service using its licensed Lower 700 MHz C Block spectrum² and 3650-3700 MHz spectrum (“3650 MHz”) in rural Minnesota.

[BEGIN CONSOLIDATED HIGHLY CONFIDENTIAL INFORMATION]

² Consolidated holds 700 MHz licenses for partitioned portions of Cellular Market Area (“CMA”) 487.

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
January 5, 2015
Page 3 of 4

[END CONSOLIDATED HIGHLY CONFIDENTIAL INFORMATION] Consolidated did not engage a broker, but did contact other companies with wireless interests in the area. **[BEGIN CONSOLIDATED HIGHLY CONFIDENTIAL INFORMATION]**

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
January 5, 2015
Page 4 of 4

**[END CONSOLIDATED HIGHLY
CONFIDENTIAL INFORMATION]** On August 28, 2014, Consolidated and AT&T executed
a final license purchase agreement.

Please direct any questions regarding this Response to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Whiteaker', with a long horizontal flourish extending to the right.

Gregory W. Whiteaker
Counsel for Consolidated Telephone Company