HERMAN & WHITEAKER, LLC

DONALD L. HERMAN, JR
GREGORY W. WHITEAKER
KENNETH C. JOHNSON†
ROBIN E. TUTTLE††
CARRIE L. DEVIER†††
SUSAN C. GOLDHAR ORNSTEIN
SARAH L. J. ACEVES††††

†Admitted in DC and VA only
††Admitted in DC, SC and FL only
†††Admitted in SC only
††††Admitted in DC only
TEL 202-600-7272
FAX 202-706-6056
3204 TOWER OAKS BLVD, STE 180
ROCKVILLE, MD 20852

May 27, 2015

Via ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *EX PARTE* NOTICE

Updating Part 1 Competitive Bidding Rules, WT Docket No. 14-170;

Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

On Tuesday, May 26, 2015, F. Bradley Erwin, CEO of FTC Management Group, Inc. ("FTC"), former Member of Congress Robin Tallon, Sarah Aceves and the undersigned, on behalf of the Rural-26 DE Coalition[1] ("Rural Coalition") and Joan Marsh from AT&T met with Matthew Berry, Chief of Staff to Commissioner Pai. The purpose of the meeting was to discuss a joint proposal ("Joint Proposal")[2] submitted by the Rural Coalition and AT&T that seeks to

[1] Company members of the Rural Coalition are listed in Attachment A attached hereto. The Rural Coalition represents an ad hoc group of rural telecommunications providers adversely affected by the exploitation of the DE rules in the AWS-3 auction ("Auction 97") and/or concerned about the likely abuse of the DE rules in the upcoming incentive auction.

[2] *See* AT&T; FTC Management Group, Inc., *et. al*., Letter to Roger Sherman, Chief, Wireless Telecomm. Bureau, *Reforming the FCC's Designated Entity Program*, WT Docket No. 14-170, GN Docket No. 12-268 (*filed* May 11, 2015).

implement fundamental changes to the Federal Communications Commission's ("Commission" or "FCC") Designated Entity ("DE") program.

During the meeting, the parties explained that the original intent of the FCC's DE program has been lost due to gamesmanship and exploitation of existing rules within the DE program as evidenced by the results of Auction 97. The parties believe that FCC adoption of the Joint Proposal will benefit those *legitimate* small businesses that the program was created to benefit. By way of background, FTC noted that even though it is a small wireless carrier and rural telephone company, it has never qualified for bidding credits under the current DE program. It did, however, bid against much larger companies that qualified for bidding credits through those companies' DEs in Auction 97. The parties noted that, in an attempt to bring real reform to the DE program, the Joint Proposal was crafted through discussions between AT&T, FTC and other small rural wireless and wireline companies. The parties are optimistic that this large carrier/small carrier collaboration will generate an earnest debate regarding much-needed changes to the DE program.

The parties described the Joint Proposal being comprised of a new, two-pronged framework that awards a non-revenue-based small business/rural telephone company bidding credit of 25% to existing communications providers with fewer than 250,000 subscribers and a gross revenue-based bidding credit of 25% designed to encourage new entrant participation. The bidding credits are proposed to be non-cumulative.

The parties also discussed a key component of the Joint Proposal – the institution of a $10 million cap on all awarded bidding credits – that the parties believe will prevent potential abuse of the DE program, along with a prohibition on the same bidder to receive multiple credits through other commonly controlled entities.[3] The parties explained that, based on data compiled in the last three major FCC spectrum auctions, a $10 million cap on bidding credits will neither discourage nor hamper bidding by legitimate small businesses. Specifically, in examining data from Auction 97, Auction 73, and Auction 66, only 11 DEs would have fallen outside the proposed $10 million cap. As detailed in Attachment B, those 11 DEs include the two DISH DEs from Auction 97, three DEs backed by U.S. Cellular, one DE backed by Cricket, one DE backed by TerreStar and four strategic investors. The parties noted that, based on historical data, no legitimate small business would find itself exceeding the $10 million bidding credit cap.

In order for the upcoming incentive auction to succeed, the parties stated that the Commission must ensure that legitimate small entities have a real opportunity to participate and obtain spectrum in the 600 MHz band. The parties therefore urged the Commission to adopt the Joint Proposal in order to tighten the DE rules and to prevent further gaming of the auction process.

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[3] The Parties discussed an exception to the "no double dipping" rule, which would apply to rural partnerships and other commonly owned rural bidders that do not bid for licenses in the same PEA, EA or CMA.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,

Donald L. Herman, Jr.
Counsel for the Rural Coalition

CC: Matthew Berry
F. Bradley Erwin
Joan Marsh

ATTACHMENT A

Rural-26 DE Coalition

FTC Management Group, Inc.

Arctic Slope Telephone Association Cooperative, Inc.

Atlantic Seawinds Communications, LLC

Bug Tussel Wireless, LLC

Chariton Valley Communications Corporation, Inc.

Chester Telephone Company

Comporium Wireless, LLC

Cordova Wireless Communications, Inc.

Horry Telephone Cooperative, Inc.

KanOkla Telephone Association, Inc.

Leaco Rural Telephone Cooperative, Inc.

MobiNet LLC

Northeastern Iowa Telephone Company

Northwest Missouri Cellular Limited Partnership

Palmetto Rural Telephone Cooperative, Inc.

Paul Bunyan Rural Telephone Cooperative

Piedmont Rural Telephone Cooperative, Inc.

Plateau Telecommunications, Inc.

RSA 1 Limited Partnership d/b/a Chat Mobility
Iowa RSA 2 Limited Partnership d/b/a Chat Mobility

Sandhill Communications, LLC

Totelcom Networks LLC

Texas RSA 7B3, L.P. d/b/a Peoples Wireless Services

Public Service Wireless, Inc.

VTel Wireless, Inc.

West Carolina Rural Telephone Cooperative, Inc.

XIT Telecommunication & Technology, LTD

ATTACHMENT B

Past Auction Data

Five (5) pages to follow

Winning Bidder	Total Winning Bids	Bidding Credit	Total Net Bids	Total Credit
Northstar Wireless, LLC	$7,845,059,400.00	25%	$5,883,794,550.00	$1,961,264,850.00
SNR Wireless LicenseCo, LLC	$5,482,364,300.00	25%	$4,111,773,225.00	$1,370,591,075.00
Advantage Spectrum, L.P.	$451,072,000.00	25%	$338,304,000.00	$112,768,000.00
2014 AWS Spectrum Bidco Corporation	$389,080,000.00	25%	$291,810,000.00	$97,270,000.00
Tristar License Group, LLC	$62,808,000.00	25%	$47,106,000.00	$15,702,000.00
Sofio, Joseph A	$17,978,000.00	25%	$13,483,500.00	$4,494,500.00
Cypress Cellular, LP	$13,579,000.00	25%	$10,184,250.00	$3,394,750.00
Orion Wireless LLC	$10,410,000.00	25%	$7,807,500.00	$2,602,500.00
KURIAN, BEAULAH T	$2,906,000.00	25%	$2,179,500.00	$726,500.00
Geneseo Communications Services, Inc.	$2,332,000.00	15%	$1,982,200.00	$349,800.00
Emery Telcom-Wireless, Inc.	$1,237,000.00	15%	$1,051,450.00	$185,550.00
Sandhill Communications, LLC	$1,063,000.00	15%	$903,550.00	$159,450.00
Northern Valley Communications, LLC	$694,000.00	15%	$589,900.00	$104,100.00
Spotlight Media Corp., Inc.	$371,000.00	25%	$278,250.00	$92,750.00
Chester Telephone Company	$483,000.00	15%	$410,550.00	$72,450.00
AT&T Wireless Services 3 LLC	$18,189,285,000.00	0%	$18,189,285,000.00	$0.00
Cellco Partnership d/b/a Verizon Wireless	$10,430,017,000.00	0%	$10,430,017,000.00	$0.00
T-Mobile License LLC	$1,774,023,000.00	0%	$1,774,023,000.00	$0.00
Puerto Rico Telephone Company, Inc.	$170,901,300.00	0%	$170,901,300.00	$0.00
NE Colorado Cellular, Inc.	$30,718,000.00	0%	$30,718,000.00	$0.00
Smith Bagley, Inc.	$10,293,000.00	0%	$10,293,000.00	$0.00
Central Texas Telephone Investments, LP	$3,321,000.00	0%	$3,321,000.00	$0.00
FTC Management Group, Inc.	$2,696,000.00	0%	$2,696,000.00	$0.00
Nsight Spectrum, LLC	$1,499,000.00	0%	$1,499,000.00	$0.00
Docomo Pacific, Inc.	$1,386,000.00	0%	$1,386,000.00	$0.00
Pioneer Telephone Cooperative, Inc.	$991,000.00	0%	$991,000.00	$0.00
Ligtel Communications, Inc.	$861,000.00	0%	$861,000.00	$0.00
Michigan Wireless, LLC	$829,000.00	0%	$829,000.00	$0.00
Gila River Telecommunications, Inc.	$818,000.00	0%	$818,000.00	$0.00
Triangle Communication System, Inc.	$221,600.00	0%	$221,600.00	$0.00
RigNet Satcom, Inc.	$155,000.00	0%	$155,000.00	$0.00
FCC	$0.00	0%	$0.00	$0.00

Winning Bidder	Total Winning Bids	Bidding Credit	Total Net Bids	Total Credit
King Street Wireless, L.P.	$400,638,000.00	25%	$300,478,500.00	$100,159,500.00
Continuum 700 LLC	$88,179,000.00	25%	$66,134,250.00	$22,044,750.00
Cavalier Wireless, LLC	$61,803,000.00	25%	$46,352,250.00	$15,450,750.00
Triad 700, LLC	$22,694,000.00	25%	$17,020,500.00	$5,673,500.00
MCBRIDE SPECTRUM PARTNERS, LLC	$8,490,000.00	25%	$6,367,500.00	$2,122,500.00
Redwood Wireless Corp.	$7,845,000.00	25%	$5,883,750.00	$1,961,250.00
Miller, David	$7,812,000.00	25%	$5,859,000.00	$1,953,000.00
Manti Telephone Company	$4,099,000.00	25%	$3,074,250.00	$1,024,750.00
KTC AWS Limited Partnership	$3,864,000.00	25%	$2,898,000.00	$966,000.00
Whidbey Telephone Company	$5,496,000.00	15%	$4,671,600.00	$824,400.00
Blue Valley Tele-Communications, Inc.	$3,079,000.00	25%	$2,309,250.00	$769,750.00
PCS Partners, L.P.	$2,821,000.00	25%	$2,115,750.00	$705,250.00
LL License Holdings, LLC	$3,812,000.00	15%	$3,240,200.00	$571,800.00
Club 42 CM Limited Partnership	$2,227,000.00	25%	$1,670,250.00	$556,750.00
PVT Networks, Inc.	$3,605,000.00	15%	$3,064,250.00	$540,750.00
VentureTel 700, Inc.	$1,940,000.00	25%	$1,455,000.00	$485,000.00
Worldcall Inc.	$1,918,000.00	25%	$1,438,500.00	$479,500.00
Cable Montana LLC	$1,770,000.00	25%	$1,327,500.00	$442,500.00
Glenwood Telephone Membership, Corporation	$1,527,000.00	25%	$1,145,250.00	$381,750.00
Midwest AWS Limited Partnership	$1,519,000.00	25%	$1,139,250.00	$379,750.00
Agri-Valley Communications, Inc.	$2,508,000.00	15%	$2,131,800.00	$376,200.00
Kurian, Thomas K	$1,479,000.00	25%	$1,109,250.00	$369,750.00
Chariton Valley Communication Corporation, Inc.	$2,335,000.00	15%	$1,984,750.00	$350,250.00
Star Telephone Membership Corporation	$1,968,000.00	15%	$1,672,800.00	$295,200.00
Buggs Island Telephone Cooperative	$1,132,000.00	25%	$849,000.00	$283,000.00
Small Ventures USA, L.P.	$1,055,000.00	25%	$791,250.00	$263,750.00
Pine Cellular Phones, Inc.	$1,646,000.00	15%	$1,399,100.00	$246,900.00
Vermont Telephone Company, Inc.	$1,597,000.00	15%	$1,357,450.00	$239,550.00
Sandhill Communications, LLC	$1,590,000.00	15%	$1,351,500.00	$238,500.00
Bascom Long Distance, Inc.	$925,000.00	25%	$693,750.00	$231,250.00
Toba Inlet PCS, LLC	$871,000.00	25%	$653,250.00	$217,750.00
MTN3B Consortium	$1,409,000.00	15%	$1,197,650.00	$211,350.00
Broadband Wireless Unlimited, LLC	$1,239,000.00	15%	$1,053,150.00	$185,850.00
Great American Broadband, Inc.	$699,000.00	25%	$524,250.00	$174,750.00
Dragon Arch, Inc.	$538,000.00	25%	$403,500.00	$134,500.00
AWS Spectrum, LLC	$887,000.00	15%	$753,950.00	$133,050.00
Columbia Cellular, Inc.	$793,000.00	15%	$674,050.00	$118,950.00
Data-Max Wireless LLC	$434,000.00	25%	$325,500.00	$108,500.00
Gold Radio Group, LLC	$710,000.00	15%	$603,500.00	$106,500.00
BPS Telephone Company	$421,000.00	25%	$315,750.00	$105,250.00
Miles Communications Corp	$392,000.00	25%	$294,000.00	$98,000.00
USA Choice Internet Services Company LLC	$387,000.00	25%	$290,250.00	$96,750.00
BEK Communications Cooperative	$383,000.00	25%	$287,250.00	$95,750.00
Buffalo-Lake Erie Wireless Systems Co., L.L.C.	$375,000.00	25%	$281,250.00	$93,750.00
Hemingford Cooperative Telephone Company	$282,000.00	25%	$211,500.00	$70,500.00
Piedmont Rural Telephone Cooperative, Inc.	$418,000.00	15%	$355,300.00	$62,700.00
West Carolina Communications, LLC	$406,000.00	15%	$345,100.00	$60,900.00
maxima international llc	$208,000.00	25%	$156,000.00	$52,000.00
WUE, Inc.	$189,000.00	25%	$141,750.00	$47,250.00
James Valley Cooperative Telephone Company	$306,000.00	15%	$260,100.00	$45,900.00
GreenFly LLC	$159,000.00	25%	$119,250.00	$39,750.00
Chester Telephone Company	$254,000.00	15%	$215,900.00	$38,100.00
Spectrum Acquisitions, Inc.	$238,000.00	15%	$202,300.00	$35,700.00
C&W Enterprises, Inc.	$129,000.00	25%	$96,750.00	$32,250.00

Winning Bidder	Total Winning Bids	Bidding Credit	Total Net Bids	Total Credit
The S&T Telephone Cooperative Association, Inc.	$192,000.00	15%	$163,200.00	$28,800.00
Reiter, Scott D	$55,000.00	25%	$41,250.00	$13,750.00
AlasConnect, Inc.	$560,000.00	0%	$560,000.00	$0.00
AST Telecom, LLC	$20,000.00	0%	$20,000.00	$0.00
AT&T Mobility Spectrum, LLC	$6,636,658,000.00	0%	$6,636,658,000.00	$0.00
Bend Cable Communications, LLC	$6,745,000.00	0%	$6,745,000.00	$0.00
Bluegrass Wireless LLC	$3,272,000.00	0%	$3,272,000.00	$0.00
Bresnan Communications, Inc.	$3,859,000.00	0%	$3,859,000.00	$0.00
Cellco Partnership d/b/a Verizon Wireless	$4,741,807,000.00		$4,741,807,000.00	$0.00
Cellco Partnership d/b/a Verizon Wireless	$4,621,353,000.00	0%	$4,621,353,000.00	$0.00
Cellular South Licenses, Inc.	$191,533,000.00	0%	$191,533,000.00	$0.00
Central Texas Telephone Investments, LP	$6,347,000.00	0%	$6,347,000.00	$0.00
CenturyTel Broadband Wireless LLC	$148,964,000.00	0%	$148,964,000.00	$0.00
CHEVRON USA INC.	$1,663,000.00	0%	$1,663,000.00	$0.00
Choice Phone LLC	$1,003,000.00	0%	$1,003,000.00	$0.00
Churchill County Telephone d/b/a CC Communications	$210,000.00	0%	$210,000.00	$0.00
Cincinnati Bell Wireless LLC	$2,829,000.00	0%	$2,829,000.00	$0.00
Comporium Wireless, LLC	$2,350,000.00	0%	$2,350,000.00	$0.00
Cox Wireless, Inc.	$304,633,000.00	0%	$304,633,000.00	$0.00
Cross Telephone Company, LLC	$2,051,000.00	0%	$2,051,000.00	$0.00
East Kentucky Network, LLC	$406,000.00	0%	$406,000.00	$0.00
FCC	$0.00	0%	$0.00	$0.00
Frontier Wireless LLC	$711,871,000.00	0%	$711,871,000.00	$0.00
Horry Telephone Cooperative, Inc.	$8,469,000.00	0%	$8,469,000.00	$0.00
I-700, LLC	$5,960,000.00	0%	$5,960,000.00	$0.00
Iowa Intelegra Consortium, LLC	$1,696,000.00	0%	$1,696,000.00	$0.00
Iowa Telecommunications Services, Inc.	$5,894,000.00	0%	$5,894,000.00	$0.00
Ligtel Communications, Inc.	$1,219,000.00	0%	$1,219,000.00	$0.00
MetroPCS 700 MHz, LLC	$313,267,000.00	0%	$313,267,000.00	$0.00
MTA Communications, Inc.	$239,000.00	0%	$239,000.00	$0.00
N.E. Colorado Wireless Technologies, Inc.	$2,022,000.00	0%	$2,022,000.00	$0.00
NSIGHTTEL WIRELESS, LLC	$3,359,000.00	0%	$3,359,000.00	$0.00
Panhandle Telecommunication Systems, Inc.	$435,000.00	0%	$435,000.00	$0.00
Paul Bunyan Rural Telephone Cooperative, Inc.	$175,000.00	0%	$175,000.00	$0.00
PBP Bidco LLC	$326,000.00	0%	$326,000.00	$0.00
Pioneer Telephone Cooperative, Inc.	$252,000.00	0%	$252,000.00	$0.00
PTI Pacifica, Inc.	$1,293,000.00	0%	$1,293,000.00	$0.00
Public Service Wireless Services, Inc.	$1,039,000.00	0%	$1,039,000.00	$0.00
Puerto Rico Telephone Company, Inc.	$31,402,000.00	0%	$31,402,000.00	$0.00
QUALCOMM Incorporated	$1,030,184,000.00	0%	$1,030,184,000.00	$0.00
Red River Rural Telephone Association, Inc.	$267,000.00	0%	$267,000.00	$0.00
Rural Telephone Service Company, Inc.	$107,000.00	0%	$107,000.00	$0.00
SAL Spectrum, LLC	$2,941,000.00	0%	$2,941,000.00	$0.00
Sky Com 700 MHZ, LLC	$2,227,000.00	0%	$2,227,000.00	$0.00
The Chillicothe Telephone Company	$1,038,000.00	0%	$1,038,000.00	$0.00
The World Company	$1,495,000.00	0%	$1,495,000.00	$0.00
Union Telephone Company	$4,385,000.00	0%	$4,385,000.00	$0.00
Vulcan Spectrum LLC	$112,793,000.00	0%	$112,793,000.00	$0.00
Wireless Communications Venture	$8,055,000.00	0%	$8,055,000.00	$0.00

Winning Bidder	Total Winning Bids	Bidding Credit	Total Net Bids	Total Credit
Denali Spectrum License, LLC	$365,445,000.00	25%	$274,083,750.00	$91,361,250.00
Barat Wireless, L.P.	$169,520,000.00	25%	$127,140,000.00	$42,380,000.00
Atlantic Wireless, L.P.	$100,392,000.00	25%	$75,294,000.00	$25,098,000.00
Cavalier Wireless, LLC	$19,943,000.00	25%	$14,957,250.00	$4,985,750.00
Daredevil Communications LLC	$13,441,000.00	25%	$10,080,750.00	$3,360,250.00
Triad AWS, Inc.	$3,193,000.00	25%	$2,394,750.00	$798,250.00
KTC AWS Limited Partnership	$3,108,000.00	25%	$2,331,000.00	$777,000.00
Hill Country Telephone Cooperative, Inc.	$4,700,000.00	15%	$3,995,000.00	$705,000.00
Palmetto Rural Telephone Cooperative, Inc.	$4,483,000.00	15%	$3,810,550.00	$672,450.00
Manti Telephone Company	$2,421,000.00	25%	$1,815,750.00	$605,250.00
Mediapolis Telephone Company	$2,392,000.00	25%	$1,794,000.00	$598,000.00
Spotlight Media Corp	$2,192,000.00	25%	$1,644,000.00	$548,000.00
LL License Holdings II, LLC	$3,435,000.00	15%	$2,919,750.00	$515,250.00
Vermont Telephone Company, Inc.	$2,911,000.00	15%	$2,474,350.00	$436,650.00
Hemingford Cooperative Telephone Company	$1,660,000.00	25%	$1,245,000.00	$415,000.00
Wittenberg Telephone Company	$1,519,000.00	25%	$1,139,250.00	$379,750.00
CROSS TELEPHONE COMPANY	$2,450,000.00	15%	$2,082,500.00	$367,500.00
Chequamegon Communications Cooperative, Inc.	$2,419,000.00	15%	$2,056,150.00	$362,850.00
Command Connect, LLC	$2,210,000.00	15%	$1,878,500.00	$331,500.00
FMTC Wireless, Inc.	$2,197,000.00	15%	$1,867,450.00	$329,550.00
NEIT Wireless, LLC	$1,315,000.00	25%	$986,250.00	$328,750.00
Blackfoot Telephone Cooperative, Inc.	$1,798,000.00	15%	$1,528,300.00	$269,700.00
West Carolina Piedmont Bidding Consortium	$1,642,000.00	15%	$1,395,700.00	$246,300.00
Fidelity Communications Company	$1,501,000.00	15%	$1,275,850.00	$225,150.00
CTC Telcom, Inc.	$1,407,000.00	15%	$1,195,950.00	$211,050.00
Space Data Spectrum Holdings, LLC	$777,000.00	25%	$582,750.00	$194,250.00
Blue Valley Tele-Communications, Inc.	$711,000.00	25%	$533,250.00	$177,750.00
Sandhill Communications, LLC	$1,179,000.00	15%	$1,002,150.00	$176,850.00
Chester Telephone Company	$1,100,000.00	15%	$935,000.00	$165,000.00
Southeastern Indiana Rural Telephone Coop., Inc.	$658,000.00	25%	$493,500.00	$164,500.00
Hancock Rural Telephone Corporation	$629,000.00	25%	$471,750.00	$157,250.00
AGRI-VALLEY COMMUNICATIONS, INC.	$1,045,000.00	15%	$888,250.00	$156,750.00
LCDW Wireless Limited Partnership	$514,000.00	25%	$385,500.00	$128,500.00
Midwest AWS Limited Partnership	$489,000.00	25%	$366,750.00	$122,250.00
18th Street Spectrum, LLC	$751,000.00	15%	$638,350.00	$112,650.00
Alenco Communications, Inc.	$437,000.00	25%	$327,750.00	$109,250.00
Stayton Cooperative Telephone Company	$391,000.00	25%	$293,250.00	$97,750.00
James Valley	$373,000.00	25%	$279,750.00	$93,250.00
BEK COMMUNICATIONS COOPERATIVE	$312,000.00	25%	$234,000.00	$78,000.00
ETCOM, LLC	$283,000.00	25%	$212,250.00	$70,750.00
La Ward Cellular Telephone Company, Inc.	$273,000.00	25%	$204,750.00	$68,250.00
Big River Telephone Company, LLC	$243,000.00	25%	$182,250.00	$60,750.00
Mt. Vernon. Net, Inc.	$227,000.00	25%	$170,250.00	$56,750.00
Ligtel Communications, Inc.	$319,000.00	15%	$271,150.00	$47,850.00
Chariton Valley Communication Corporation, Inc.	$268,000.00	15%	$227,800.00	$40,200.00
BPS Telephone Company	$228,000.00	15%	$193,800.00	$34,200.00
CCTN BIDDING CONSORTIUM	$228,000.00	15%	$193,800.00	$34,200.00
C&W Enterprises INC.	$226,000.00	15%	$192,100.00	$33,900.00
Dakota Wireless Group, LLC	$222,000.00	15%	$188,700.00	$33,300.00
Green Hills Area Cellular Telephone, Inc.	$213,000.00	15%	$181,050.00	$31,950.00
Reservation Telephone Cooperative, Inc.	$92,000.00	25%	$69,000.00	$23,000.00
Route 66 Wireless, LLC	$72,000.00	25%	$54,000.00	$18,000.00
Three River Telco	$72,000.00	25%	$54,000.00	$18,000.00
Farmers Telecommunications Cooperative, Inc.	$85,000.00	15%	$72,250.00	$12,750.00

Winning Bidder	Total Winning Bids	Bidding Credit	Total Net Bids	Total Credit
The S&T Telephone Cooperative Association, Inc.	$72,000.00	15%	$61,200.00	$10,800.00
Northeast Missouri Rural Telephone Company	$28,000.00	15%	$23,800.00	$4,200.00
WUE INC	$8,000.00	25%	$6,000.00	$2,000.00
3 Rivers Telephone Cooperative, Inc.	$1,066,000.00	0%	$1,066,000.00	$0.00
American Cellular Corporation	$65,880,000.00	0%	$65,880,000.00	$0.00
AST Telecom, LLC	$34,000.00	0%	$34,000.00	$0.00
Atlantic Seawinds Communications, LLC	$1,477,000.00	0%	$1,477,000.00	$0.00
AWS Wireless Inc.	$115,503,000.00	0%	$115,503,000.00	$0.00
Bend Cable Communications, LLC	$528,000.00	0%	$528,000.00	$0.00
Big Bend Telecom, LTD	$129,000.00	0%	$129,000.00	$0.00
Cable One, Inc.	$22,148,000.00	0%	$22,148,000.00	$0.00
Carolina West Wireless, Inc.	$4,621,000.00	0%	$4,621,000.00	$0.00
Cellco Partnership d/b/a Verizon Wireless	$2,808,599,000.00	0%	$2,808,599,000.00	$0.00
Cellular South Licenses, Inc.	$33,025,000.00	0%	$33,025,000.00	$0.00
Centennial Michiana License Company LLC	$9,134,000.00	0%	$9,134,000.00	$0.00
Central Texas Telephone Investments, LP	$4,940,000.00	0%	$4,940,000.00	$0.00
CenturyTel Broadband Wireless LLC	$468,000.00	0%	$468,000.00	$0.00
Churchill County Telephone d/b/a CC Communications	$60,000.00	0%	$60,000.00	$0.00
Cincinnati Bell Wireless LLC	$37,071,000.00	0%	$37,071,000.00	$0.00
Cingular AWS, LLC	$1,334,610,000.00	0%	$1,334,610,000.00	$0.00
City of Ketchikan dba Ketchikan Public Utilities	$157,000.00	0%	$157,000.00	$0.00
Comporium Wireless, LLC	$295,000.00	0%	$295,000.00	$0.00
Cricket Licensee (Reauction), Inc.	$710,214,000.00	0%	$710,214,000.00	$0.00
FCC	$0.00	0%	$0.00	$0.00
FTC Management Group, Inc.	$1,380,000.00	0%	$1,380,000.00	$0.00
Grand River Communications, Inc.	$103,000.00	0%	$103,000.00	$0.00
Horry Telephone Cooperative, Inc.	$925,000.00	0%	$925,000.00	$0.00
Innovative Communication Corporation	$184,000.00	0%	$184,000.00	$0.00
Iowa Telecommunications Services, Inc.	$11,473,000.00	0%	$11,473,000.00	$0.00
Lynch AWS Corporation	$485,000.00	0%	$485,000.00	$0.00
MetroPCS AWS, LLC	$1,391,410,000.00	0%	$1,391,410,000.00	$0.00
MTA Communications, Inc.	$2,251,000.00	0%	$2,251,000.00	$0.00
MTPCS License Co., LLC	$2,348,000.00	0%	$2,348,000.00	$0.00
Mutual Telephone Company	$312,000.00	0%	$312,000.00	$0.00
North Dakota Network Company	$177,000.00	0%	$177,000.00	$0.00
Northwest Missouri Cellular Limited Partnership	$26,000.00	0%	$26,000.00	$0.00
NSIGHTTEL WIRELESS, LLC	$2,099,000.00	0%	$2,099,000.00	$0.00
NTELOS Inc.	$2,295,000.00	0%	$2,295,000.00	$0.00
Paul Bunyan Rural Telephone Cooperative	$329,000.00	0%	$329,000.00	$0.00
PetroCom License Corporation	$70,000.00	0%	$70,000.00	$0.00
Pine Cellular Phones, Inc.	$601,000.00	0%	$601,000.00	$0.00
Plateau Telecommunications, Inc.	$4,200,000.00	0%	$4,200,000.00	$0.00
Public Service Wireless Services, Inc.	$5,480,000.00	0%	$5,480,000.00	$0.00
Red Rock Spectrum Holdings, LLC	$7,466,000.00	0%	$7,466,000.00	$0.00
SKT, Inc.	$774,000.00	0%	$774,000.00	$0.00
Smithville Spectrum, LLC	$2,011,000.00	0%	$2,011,000.00	$0.00
SpectrumCo LLC	$2,377,609,000.00	0%	$2,377,609,000.00	$0.00
Telephone Electronics Coporation	$559,000.00	0%	$559,000.00	$0.00
T-Mobile License LLC	$4,182,312,000.00	0%	$4,182,312,000.00	$0.00
Union Telephone Company	$1,948,200.00	0%	$1,948,200.00	$0.00
Volcano Internet Provider	$105,000.00	0%	$105,000.00	$0.00