

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re)	
)	
MARITIME COMMUNICATIONS/LAND MOBILE, LLC)	EB Docket No. 11-71
)	File No. EB-09-IH-1751
)	FRN: 0013587779
Participant in Auction No. 61 and Licensee of Various Authorizations in the Wireless Radio Services)	
)	
Applicant for Modification of Various Authorizations in the Wireless Radio Services)	
)	Application File Nos. 0004030479,
Applicant with ENCANA OIL AND GAS (USA), INC.; DUQUESNE LIGHT COMPANY; DCP MIDSTREAM, LP; JACKSON COUNTY RURAL MEMBERSHIP ELECTRIC COOPERATIVE; PUGET SOUND ENERGY, INC.; ENBRIDGE ENERGY COMPANY, INC.; INTERSTATE POWER AND LIGHT COMPANY; WISCONSIN POWER AND LIGHT COMPANY; DIXIE ELECTRIC MEMBERSHIP CORPORATION, INC.; ATLAS PIPELINE – MID CONTINENT, LLC; DENTON COUNTY ELECTRIC COOPERATIVE, INC., DBA COSERV ELECTRIC; AND SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY)	0004144435, 0004193028, 0004193328, 0004354053, 0004309872, 0004310060, 0004314903, 0004315013, 0004430505, 0004417199, 0004419431, 0004422320, 0004422329, 0004507921, 0004153701, 0004526264, 0004636537 & 0004604962

**RESPONSE TO ENFORCMENT BUREAU'S SECOND SET OF
INTERROGATORIES TO MARITIME COMMUNICATIONS/LAND
MOBILE, LLC CONCERNING ISSUES (A)-(F) AND (H)-(J)**

Maritime Communications/Land Mobile, LLC (“Maritime”), by undersigned legal counsel, hereby responds to the *Enforcement Bureau's Second Set of Interrogatories to Maritime Communications/Land Mobile, LLC Concerning Issues (a)-(f) and (h)-(j)*.

Set forth below are the Enforcement Bureau’s numbered requests, each followed by Maritime’s answer and/or objections.

1. *Identify all individuals who assisted in the preparation of Maritime's May 21, 2015 Response, and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers. of the information upon which Maritime relied to provide each of these figures.*

Other than legal counsel, Maritime relied only on Sandra and Donald DePriest, whose identity and pertinent information is known to the Enforcement Bureau.

2. *Identify all individuals who assisted in the preparation of Maritime's July 1, 2015 Interrogatory Response, and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.*

Other than legal counsel, Maritime relied only on Sandra and Donald DePriest, whose identity and pertinent information is known to the Enforcement Bureau.

3. *Identify all individuals who assisted in the preparation of Maritime's July 1, 2015 Document Response, and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.*

Other than legal counsel, Maritime relied only on Sandra and Donald DePriest, whose identity and pertinent information is known to the Enforcement Bureau.

4. *Identify all individuals who assisted in the preparation of Maritime's July 17, 2015 Interrogatory Response, and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.*

Other than legal counsel, Maritime relied only on Sandra and Donald DePriest, whose identity and pertinent information is known to the Enforcement Bureau.

5. *Identify all individuals who assisted in the preparation of Maritime's July 17, 2015 Document Response, and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.*

Other than legal counsel, Maritime relied only on Sandra and Donald DePriest, whose identity and pertinent information is known to the Enforcement Bureau.

6. *Identify each and every person that Maritime expects to rely on as a witness and/or for whom Maritime intends to submit written direct testimony for the hearing on Issues (a)-(f) and (h)-(j). For each and every person identified, state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.*

Maritime has not yet planned its direct case and therefore does not know what witness testimony, if any, it may present at trial.

7. *Identify each and every document that Maritime expects to offer at the hearing on Issues (a)-(f) and (h)-(j). If documents have been previously provided to the Commission, identify with particularity the date the document was provided and precise Exhibit and page number(s) of document.*

Maritime has not yet planned its direct case and therefore does not know what documentary or other evidence, if any, it may present at trial.

8. *State whether the MCT Corp. Amended and Restated Bylaws, attached as Exhibit A to Donald DePriest's February 10, 2011 letter to the Bureau (the "Bylaws") are a complete copy of the original document, and whether the Bylaws were in effect during the Relevant Period. If the Bylaws were not in effect at any point during the Relevant Period, identify with particularity the provisions that were amended; describe how those provisions were amended; and state the date of each amendment. Copies of prior versions of MCT Corp.'s bylaws may be attached in lieu of identification.*

As explained in the February 10, 2011, response, the referenced documents were obtained by Mr. DePriest's counsel from MCT counsel. Mr. DePriest is unable to verify the accuracy of the information or whether there were any changes during specified period.

9. *For each and every individual who served as a Director and/or Officer of MCT Corp. during the Relevant Period, state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.*

In recent years Mr. DePriest has had no contact with most of the former MCT Corp. officers and directors. Accordingly, except as otherwise stated below, Maritime has no information responsive to this request beyond that provided by Mr. DePriest in pre-designation responses to Enforcement Bureau inquiries. On information and belief, the following is partial current contact information for certain former officers and directors of MCT Corp.

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Fax 615-263-3140

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13625-A Dulles Technology Drive
Herndon, Virginia 20171
Tel 703-885-3400
Fax 703-885-3490

10. *Identify all individuals who assisted in the preparation of Maritime's response to the Bureau's Second Set of Interrogatories, and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.*

Other than legal counsel, Maritime relied only on Sandra and Donald DePriest, whose identity and pertinent information is known to the Enforcement Bureau.

Respectfully submitted,

By: 
Robert J. Keller, Counsel for Maritime
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Dated: August 5, 2015

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of August, 2015, I caused copies of the foregoing document to be served, by U.S. Postal Service, First Class postage prepaid, on the following:

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Chief Administrative Law Judge
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