

Andre J. Lachance
Assistant General Counsel



September 18, 2015

1300 I Street, NW
Suite 400 West
Washington, DC 20005

Phone 202. 515.2439
Fax 202.289.6781
andy.lachance@verizon.com

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

Re: *Flat Wireless, LLC v. Cellco Partnership d/b/a Verizon Wireless*, EB Docket No. 15-147, File No. EB-15-MD-005

Dear Ms. Dortch:

Pursuant to the Protective Order entered in the above-captioned proceeding, copies of the highly confidential and confidential information declarations from the following authorized representatives of Verizon Wireless are attached for the record: Steven G. Bradbury, Hrishikesh N. Hari, and Brian Rafkin, outside counsel for Verizon Wireless, and Hal Singer, outside consultant for Verizon Wireless. Confidential information declarations from the following representatives of Verizon Wireless are also attached for the record: Chris Miller, Robert Strobel, Tamara Preiss, and Andre Lachance, in-house counsel for Verizon Wireless.

Sincerely,

A handwritten signature in cursive script that reads "Andre J. Lachance". The signature is written in black ink and is positioned above a horizontal line.

Andre J. Lachance

Attachments

cc: Rosemary McEnergy
Lisa E. Boehley

Appendix A to Protective Order

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

In the Matter of)
)
Flat Wireless, LLC)
)
)
Complainant,) EB Docket No. 15-147
) File No. EB-15-MD-005
)
v.)
)
Cellco Partnership d/b/a Verizon Wireless)
)
Defendant.)

DECLARATION

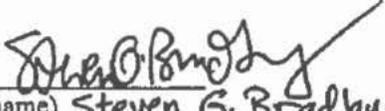
I, Steven G. Bradbury, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any information obtained as a result of the order is due solely to my capacity as Counsel or consultant to a party or other person described in Paragraph 5 of the foregoing Protective Order, as applicable, and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Confidential Information is used only as provided in the Protective Order; and (2) documents containing Confidential Information are not duplicated except as specifically permitted by the terms of Paragraph 9 of the Protective Order, and I certify that I have verified that there are in place procedures, at my firm or office, to prevent unauthorized disclosure of Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed this 16th day of Sept., 2015.

(Signed) 
(Printed name) Steven G. Bradbury
(Representing) Verizon
(Title) Partner
(Employer) Dechert LLP
(Address) 1900 K Street, NW, DC 20006
(Phone) (202) 261-3483

Appendix B to Protective Order

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554

In the Matter of)
)
Flat Wireless, LLC)
)
)
Complainant,) EB Docket No. 15-147
) File No. EB-15-MD-005
)
v.)
)
Cellco Partnership d/b/a Verizon Wireless)
)
Defendant.)

DECLARATION

I, Steven G. Bradley, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Highly Confidential Information submitted by parties to this proceeding. I understand that the Highly Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

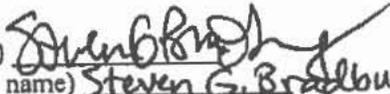
Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any information obtained as a result of the order is due solely to my capacity as Outside Counsel of Record or Outside Consultant to a party or other person described in Paragraph 8 of the foregoing Protective Order, as applicable, and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Highly Confidential Information is used only as provided in the Protective Order; and (2) documents containing Highly Confidential Information are not duplicated except as specifically permitted by the terms of Paragraph 9 of the Protective Order, and I certify that I have verified that there are in place procedures, at my firm or office, to prevent unauthorized disclosure of Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed

to them in the Protective Order.

Executed this 16th day of Sept., 2015.

(Signed) 
(Printed name) Steven G. Bradbury
(Representing) Verizon
(Title) Partner
(Employer) Dechert LLP
(Address) 1900 K St, NW, DC 20006
(Phone) (202) 261-3483

Appendix A to Protective Order

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

In the Matter of)
)
Flat Wireless, LLC)
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)
Complainant,) EB Docket No. 15-147
) File No. EB-15-MD-005
)
v.)
)
Cellco Partnership d/b/a Verizon Wireless)
)
Defendant.)

DECLARATION

I, HARSHKESH HARI, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

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Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed this 16th day of September, 2015.

(Signed) 
(Printed name) HEISHIKESH HARI
(Representing) Verizon Wireless
(Title) Associate
(Employer) Duchet & LLP
(Address) 1900 K ST NW WASHINGTON, DC
(Phone) 202-241-3347

Appendix B to Protective Order

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

In the Matter of)

Flat Wireless, LLC)

Complainant,)

v.)

Cellco Partnership d/b/a Verizon Wireless)

Defendant.)

EB Docket No. 15-147
File No. EB-15-MD-005

DECLARATION

I, HIRSHIKESH HARA, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Highly Confidential Information submitted by parties to this proceeding. I understand that the Highly Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any information obtained as a result of the order is due solely to my capacity as Outside Counsel of Record or Outside Consultant to a party or other person described in Paragraph 8 of the foregoing Protective Order, as applicable, and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Highly Confidential Information is used only as provided in the Protective Order; and (2) documents containing Highly Confidential Information are not duplicated except as specifically permitted by the terms of Paragraph 9 of the Protective Order, and I certify that I have verified that there are in place procedures, at my firm or office, to prevent unauthorized disclosure of Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed

to them in the Protective Order.

Executed this 16th day of September, 2015.

(Signed) [Signature]
(Printed name) HARSHIKESH HAREL
(Representing) Verizon Wireless
(Title) Associate
(Employer) Dechert LLP
(Address) 1900 K ST NW WASHINGTON, DC
(Phone) 202-261-3347

Appendix A to Protective Order

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

In the Matter of)
)
Flat Wireless, LLC)
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)
)
Complainant,) EB Docket No. 15-147
) File No. EB-15-MD-005
)
v.)
)
Celco Partnership d/b/a Verizon Wireless)
)
Defendant.)

DECLARATION

I, Brian Rafkin, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any information obtained as a result of the order is due solely to my capacity as Counsel or consultant to a party or other person described in Paragraph 5 of the foregoing Protective Order, as applicable, and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Confidential Information is used only as provided in the Protective Order; and (2) documents containing Confidential Information are not duplicated except as specifically permitted by the terms of Paragraph 9 of the Protective Order, and I certify that I have verified that there are in place procedures, at my firm or office, to prevent unauthorized disclosure of Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed this 16th day of September, 2015.

(Signed) Brian Refkin
(Printed name) Brian Refkin
(Representing) Cellco Partnership d/b/a Verizon Wireless
(Title) Associate
(Employer) Duchest LLP
(Address) 1900 K St NW, Washington, DC 20006
(Phone) (202) 281-3318

Appendix B to Protective Order
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554

In the Matter of)	
)	
Flat Wireless, LLC)	
)	
Complainant,)	EB Docket No. 15-147
)	File No. EB-15-MD-005
v.)	
)	
Celco Partnership d/b/a Verizon Wireless)	
)	
Defendant.)	

DECLARATION

I, Brian Rafkin, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Highly Confidential Information submitted by parties to this proceeding. I understand that the Highly Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any information obtained as a result of the order is due solely to my capacity as Outside Counsel of Record or Outside Consultant to a party or other person described in Paragraph 8 of the foregoing Protective Order, as applicable, and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Highly Confidential Information is used only as provided in the Protective Order; and (2) documents containing Highly Confidential Information are not duplicated except as specifically permitted by the terms of Paragraph 9 of the Protective Order, and I certify that I have verified that there are in place procedures, at my firm or office, to prevent unauthorized disclosure of Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed

to them in the Protective Order.

Executed this 16th day of September, 2015.

(Signed) Brian Rafkin
(Printed name) Brian Rafkin
(Representing) Callie Pfauhsip 41616 Verizon Wireless
(Title) Associate
(Employer) Dishnet U.P.
(Address) 1500 16 St NW, Washington, DC 20006
(Phone) (202) 776-3312

Appendix A to Protective Order

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

In the Matter of)
)
Flat Wireless, LLC)
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)
Complainant,) EB Docket No. 15-147
) File No. EB-15-MD-005
)
v.)
)
Cellco Partnership d/b/a Verizon Wireless)
)
Defendant.)

DECLARATION

I, Hal Singer, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any information obtained as a result of the order is due solely to my capacity as Counsel or consultant to a party or other person described in Paragraph 5 of the foregoing Protective Order, as applicable, and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Confidential Information is used only as provided in the Protective Order; and (2) documents containing Confidential Information are not duplicated except as specifically permitted by the terms of Paragraph 9 of the Protective Order, and I certify that I have verified that there are in place procedures, at my firm or office, to prevent unauthorized disclosure of Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed this 16 day of September, 2015.

(Signed) HS
(Printed name) Hal Singer
(Representing) Verizon Wireless
(Title) Principal
(Employer) Economico Inc.
(Address) 2121 K St NW Suite 1100 DC 20037
(Phone) 202 747 3520

Appendix B to Protective Order

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554

In the Matter of)
Flat Wireless, LLC)
Complainant,) EB Docket No. 15-147
v.) File No. EB-15-MD-005
Cellco Partnership d/b/a Verizon Wireless)
Defendant.)

DECLARATION

I, Hal Singer, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Highly Confidential Information submitted by parties to this proceeding. I understand that the Highly Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

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Capitalized terms used herein and not otherwise defined shall have the meanings ascribed

to them in the Protective Order.

Executed this 16 day of September, 2015.

(Signed) [Signature]
(Printed name) Hal Singer
(Representing) Verizon Wireless
(Title) Principal
(Employer) Genomix Inc.
(Address) 7121 16 St NW Suite 1100 DC 20037
(Phone) 202 992 3520

Appendix A to Protective Order

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

In the Matter of)	
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Flat Wireless, LLC)	
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)	
)	EB Docket No. 15-147
Complainant,)	File No. EB-15-MD-005
)	
v.)	
)	
Cellco Partnership d/b/a Verizon Wireless)	
)	
Defendant.)	

DECLARATION

I, Chris Miller, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

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Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed this 17th day of September, 2015.

(Signed) Chris Miller
(Printed name) Chris Miller
(Representing) Verizon Wireless
(Title) VP & Associate General Counsel
(Employer) Verizon
(Address) 1320 N. Courthouse Road, 9th Floor, Arlington, VA 22201
(Phone) (703) 351-3071

Appendix A to Protective Order

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

In the Matter of)
Flat Wireless, LLC)
Complainant,) EB Docket No. 15-147
v.) File No. EB-15-MD-005
Cellco Partnership d/b/a Verizon Wireless)
Defendant.)

DECLARATION

I, Robert Strobel, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any information obtained as a result of the order is due solely to my capacity as Counsel or consultant to a party or other person described in Paragraph 5 of the foregoing Protective Order, as applicable, and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Confidential Information is used only as provided in the Protective Order; and (2) documents containing Confidential Information are not duplicated except as specifically permitted by the terms of Paragraph 9 of the Protective Order, and I certify that I have verified that there are in place procedures, at my firm or office, to prevent unauthorized disclosure of Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed this 17th day of September, 2015.

(Signed) Robert O. Strobel
(Printed name) Robert O. Strobel
(Representing) Verizon
(Title) Assistant General Counsel
(Employer) Verizon
(Address) One Verizon Way, Basking Ridge
(Phone) 908-559-7357

Appendix A to Protective Order

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

In the Matter of)
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Flat Wireless, LLC)
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Complainant,) EB Docket No. 15-147
) File No. EB-15-MD-005
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v.)
)
Cellco Partnership d/b/a Verizon Wireless)
)
Defendant.)

DECLARATION

I, Taman Press hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

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Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed this 15th day of September, 2015.

(Signed) [Signature]
(Printed name) Tamara L Price
(Representing) Verizon
(Title) V.P. Federal Representative
(Employer) Verizon
(Address) 1700 I St. NW, Suite 400 W,
(Phone) 202-515-2540 Washington, DC
20005

Appendix A to Protective Order

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

In the Matter of)	
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Flat Wireless, LLC)	
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)	
)	EB Docket No. 15-147
Complainant,)	File No. EB-15-MD-005
)	
v.)	
)	
Cellco Partnership d/b/a Verizon Wireless)	
)	
Defendant.)	

DECLARATION

I, Andre Lachance, hereby declare under penalty of perjury that I have read and understand the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

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Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed this 18th day of September, 2015.

(Signed) *Andre J. Lechance*
(Printed name) Andre J. Lechance
(Representing) Verizon
(Title) Assistant General Counsel
(Employer) Verizon
(Address) 1300 I St, New Washington, DC 20005
(Phone) 202-515-2439

