



1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000

www.wileyrein.com

October 23, 2015

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

**Re: Notice of Ex Parte Presentation, Applications of LightSquared  
Subsidiary LLC, Debtor-In-Possession, and LightSquared Subsidiary LLC, for  
FCC Consent to Assign Licenses and Other Authorizations and Request for  
Declaratory Ruling on Foreign Ownership, DA 15-653 and IB Docket No. 15-  
126**

Dear Ms. Dortch:

On Wednesday, October 21, 2015, Dick Wiley, Wayne Johnsen and Scott Delacourt of Wiley Rein LLP; David Leland and Paul Kerlin of Skadden, Arps, Slate, Meagher & Flom LLP; and Sandy Qusba of Simpson Thacher & Bartlett, representing JPMorgan Chase & Co. (“JPMC”), met with Jonathan Sallet, Jennifer Tatel, Bill Freedman, Bill Richardson and Royce Sherlock of the General Counsel’s Office; Phil Verveer of the Office of Chairman Wheeler; Charles Mathias of the Wireless Telecommunications Bureau; Nese Guendelsberger of the International Bureau; and Jonathan Chambers of the Office of Strategic Planning. The purpose of the meeting was to discuss JPMC’s October 6<sup>th</sup> filing with the Commission<sup>1</sup> and related issues regarding JPMC’s qualification to hold a minority, non-controlling interest in LightSquared under the FCC’s character policy guidelines.<sup>2</sup>

Consistent with its October 6<sup>th</sup> filing, JPMC presented information regarding its qualifications to hold FCC licenses. JPMC discussed matters relevant to the FCC’s case-by-case review of character issues, which, in accordance with the

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<sup>1</sup> Letter from Richard E. Wiley, Wayne D. Johnsen, and Scott D. Delacourt, Counsel to JP Morgan Chase & Co., to Marlene H. Dortch, Secretary, Federal Communications Commission, IB Docket No. 15-126 (filed Oct. 6, 2015).

<sup>2</sup> See *Policy Regarding Character Qualifications in Broadcast Licensing*, Report, Order and Policy Statement, 102 FCC 2d 1179, ¶ 60 (1986) (“1986 Character Policy Statement”), modified, Policy Statement and Order, 5 FCC Rcd 3252 (1990) (“1990 Character Policy Statement”), recon. granted in part, Memorandum Opinion and Order, 6 FCC Rcd 3488 (1991), modified in part, Memorandum Opinion and Order, 7 FCC Rcd 6564 (1992) (“Character Policy Statement”).

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FCC's Character Policy Statement, includes consideration of various mitigation factors such as (1) the nature and seriousness of the conduct; (2) the nature of the participation, if any, of the managers and owners; (3) any remedial action taken to curb the conduct and/or dismiss the perpetrator; and (4) the applicant's past record of compliance with FCC rules and policies. *See 1990 Character Policy Statement* at ¶ 102 (listing the mitigating factors the FCC considers). The presentation focused on providing the FCC with information from the DOJ Agreement<sup>3</sup> and information on remedial actions taken by JPMC. The meeting also included a discussion of JPMC's desire to secure expeditiously the FCC approvals necessary for LightSquared to emerge from bankruptcy. Representatives of JPMC and the FCC discussed various alternatives for resolving the outstanding issues and the associated timeframes for bringing the issues to closure.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Should you have any questions, please contact the undersigned.

Sincerely,

*/s/ Scott D. Delacourt*

Richard E. Wiley  
Wayne D. Johnsen  
Scott D. Delacourt  
*Counsel to JPMorgan Chase & Co.*

cc (via e-mail): Jonathan Sallet  
Phil Verveer  
Jennifer Tatel  
Bill Freedman  
Bill Richardson  
Royce Sherlock  
Charles Mathias

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<sup>3</sup> Plea Agreement, U.S. v. JPMorgan Chase & Co. (D. Conn. May 20, 2015); *see also* Letter from Wayne D. Johnsen to Marlene H. Dortch, IB Docket No. 15-126 (filed Jul. 1, 2015).



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Nese Guendelsberger  
Jonathan Chambers