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**LNGS** | LUKAS,  
NACE,  
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& SACHS, LLP

November 5, 2015

**Via ECFS**

**REDACTED – FOR PUBLIC INSPECTION**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: *Applications of AT&T Mobility Spectrum, LLC, Tampnet, Inc., Tampnet License LLC, Broadpoint License Co., LLC, and Broadpoint Wireless License Co., LLC for Consent to Assign Licenses and Approval of Long-Term De Facto Transfer Spectrum Leasing Arrangements, WT Docket No. 15-255*

Dear Ms. Dortch:

This letter transmits the response (“Response”) of Broadpoint License Co., LLC and Broadpoint Wireless License Co., LLC (jointly “Broadpoint”) to the Wireless Telecommunications Bureau (“Bureau”) General Information Request dated October 23, 2015 (“Request”) to Broadpoint. As directed by the Request and/or the Joint Protective Order adopted in this proceeding, two unredacted copies of the Response are being filed by hand with Scott Patrick of the Bureau. One unredacted copy of the Response is also being filed with the Secretary’s Office. Copies of the redacted submission have also been filed on ECFS and distributed to the Commission personnel designated in the Request.

Please direct any questions to the undersigned attorney for Broadpoint.

Sincerely,



Todd Slamowitz

Cc: Scott Patrick (by hand delivery)

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Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, DC 20554

Re: *Applications of AT&T Mobility Spectrum, LLC, Tampnet, Inc., Tampnet License LLC, Broadpoint License Co., LLC, and Broadpoint Wireless License Co., LLC for Consent to Assign Licenses and Approval of Long-Term De Facto Transfer Spectrum Leasing Arrangements, WT Docket No. 15-255*

Dear Ms. Dortch:

Broadpoint License Co., LLC and Broadpoint Wireless License Co., LLC (collectively “Broadpoint” or “Company”), by its attorney, responds (the “Response”) to the Wireless Telecommunications Bureau General Information Request dated October 23, 2015 (“Request”).<sup>1</sup> The Request seeks information to assist the Bureau to complete its review of the applications in the above-referenced proceeding.

The Request calls for Broadpoint to submit certain information sensitive from a commercial, competitive and financial perspective, and that Broadpoint would not reveal in the ordinary course of business to the public or its competitors. Broadpoint is submitting information on a Highly Confidential basis under the Joint Protective Order issued in this proceeding on October 23, 2015. Any inadvertent inclusion of material subject to an assertion of the attorney-

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<sup>1</sup> Letter from Roger C. Sherman, Chief, Wireless Telecommunications Bureau, to Jonathan D. Foxman, Broadpoint License Co., LLC., WT Docket No. 15-255 (October 23, 2015) and accompanying General Information Request.

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client attorney work-product, or other applicable privilege is not intended as a waiver of such privilege. Broadpoint requests that any privileged material inadvertently produced be returned to Broadpoint when such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such material.

In the public version of the Response, Broadpoint has redacted Highly Confidential Information and marked the redactions with “[BEGIN BROADPOINT HIGHLY CONFIDENTIAL INFORMATION] ... [END BROADPOINT 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 ORDER IN WT DOCKET NO. 15-225 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 Broadpoint to assign the Cellular spectrum that is the subject of these applications to AT&T and to Tampnet, including any attempts made to enter into a sale of this spectrum or alternative arrangements with parties other than AT&T or Tampnet.

**Response:**

**Background**

In June, 2010, Broadpoint acquired PetroCom, the predecessor company which provided wireless service in the Gulf of Mexico. [BEGIN BROADPOINT HIGHLY CONFIDENTIAL INFORMATION]

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**[END BROADPOINT HIGHLY CONFIDENTIAL INFORMATION]**

2. On page 6 of the Public Interest Statement attached to the application to assign licenses from Broadpoint to Tampnet, File No. 0006893367, the Applicants state that granting the application will permit Tampnet “to provide a variety of innovative wireless products and services in the Gulf of Mexico to serve the unique needs of customers in that area.” Provide a detailed discussion whether the Proposed Transaction includes a transition of existing Broadpoint customers to Tampnet and, if so, the content of such transition plans.

**Response:**

The proposed transaction does take into consideration the transitioning of the current Broadpoint customer base to Tampnet. Though a transition services agreement has not been entered into as of this date, it is expected that Broadpoint and its affiliate company, MTPCS, LLC, will provide transition services to Broadpoint to support the ongoing operations of the business in the Gulf of Mexico. **[BEGIN BROADPOINT HIGHLY CONFIDENTIAL INFORMATION]**

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**[END BROADPOINT HIGHLY CONFIDENTIAL  
INFORMATION]**

Please direct any questions to the undersigned attorney for Broadpoint.

Sincerely,

Todd Slamowitz

cc: Scott Patrick (by hand delivery)