

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
)
Joint Petition of Diamond Communications LLC)
and Its Current and Future Subsidiaries and)
Affiliates for Waiver of 47 C.F.R. § 17.47(b))
)

**JOINT PETITION OF DIAMOND COMMUNICATIONS LLC
AND ITS CURRENT AND FUTURE SUBSIDIARIES AND AFFILIATES
FOR WAIVER OF SECTION 17.47(b) OF THE COMMISSION’S RULES**

Diamond Communications LLC, on behalf of all of its current and future subsidiaries and affiliates (collectively, the “Diamond Companies”), request that the Commission waive Section 17.47(b) of the Commission’s Rules, 47 C.F.R. § 17.47(b), to allow for annual lighting inspections, rather than quarterly lighting inspections, for all towers owned or operated by the Diamond Companies that are monitored by the Flash Technology Tower Monitoring System (“FTTMS”). This Joint Petition is filed pursuant to Sections 1.3 and 1.925 of the Commission’s Rules and consistent with the Commission’s Memorandum Opinion and Order (DA-12-1501) released on September 20, 2012,¹ which established a procedure for the Commission to grant, in an expedited manner, waivers upon submission and review a of a streamlined petition containing certain certifications.² In the *Diamond Initial FTTMS Waiver Order*, the Commission waived the quarterly lighting inspection requirement for towers owned or operated by Diamond Communications LLC, Diamond Towers LLC, Diamond Towers II LLC, and

¹ *In re Joint Petition of Diamond Communications LLC, Diamond Towers LLC, Diamond Towers II LLC, and Diamond Towers III LLC for Waiver of 47 C.F.R. § 17.47(b), Memorandum Opinion and Order, DA-12-1501, 27 FCC Rcd 11101 (rel. Sept. 20, 2012) (the “Diamond Initial FTTMS Waiver Order”).*

² *Id.* at ¶ 7.

Diamond Towers III LLC that are monitored by FTTMS; but the Commission did not explicitly extend the waiver to “all current and future towers that Diamond owns and operates, either directly or through affiliates, at which it deploys the FTTMS” as requested by the Petitioners.³ This Joint Petition seeks to explicitly extend the waiver to all current and future towers owned or operated by any of the Diamond Companies and that are monitored by FTTMS.

The certification required by the procedure established in the *Diamond Initial FTTMS Waiver Order* is attached.

Should there be any questions regarding this request, please contact the undersigned.

Respectfully submitted,

DIAMOND COMMUNICATIONS LLC AND
ITS CURRENT AND FUTURE
SUBSIDIARIES AND AFFILIATES

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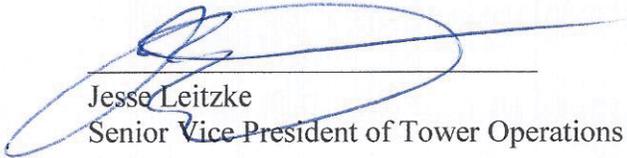
³ *In re Joint Petition of Diamond Communications LLC, Diamond Towers LLC, Diamond Towers II LLC, and Diamond Towers III LLC for Waiver of 47 C.F.R. § 17.47(b)*, Joint Petition at 2, 5 (filed Aug. 15, 2012).

CERTIFICATION

I, Jesse Leitzke, hereby declare that the following is true and correct to the best of my knowledge, information and belief:

1. I am the Senior Vice President of Tower Operations of Diamond Communications LLC.
2. I am authorized to make this Certification on behalf of Diamond Communications LLC and its subsidiaries and affiliates (collectively, "Diamond").
3. Diamond is headquartered at 820 Morris Turnpike, Suite 104, Short Hills, New Jersey 07078.
4. Diamond is in the business of constructing and maintaining antenna towers in the United States.
5. Certain of Diamond's towers are monitored by the Flash Technology Tower Monitoring Systems ("FTTMS") under the process described in *In the Matter of Request of Global Tower LLC for Waiver of 47 C.F.R. § 17.47(b)*, Memorandum Opinion and Order, 23 FCC Rcd 16531 (WTB 2008) and *In re Joint Petition of Diamond Communications LLC, Diamond Towers LLC, Diamond Towers II LLC, and Diamond Towers III LLC for Waiver of 47 C.F.R. § 17.47(b)*, Memorandum Opinion and Order, 27 FCC Rcd 11101 (rel. Sept. 20, 2012).
6. Diamond maintains facilities to receive notifications of failures from the FTTMS, which enable Diamond to carry out its responsibilities under Part 17 of the Commission's Rules.
7. I have read the foregoing Petition and the facts set forth in that Petition are true and correct.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th day of November, 2015.



Jesse Leitzke
Senior Vice President of Tower Operations