

REDACTED – FOR PUBLIC INSPECTION

November 13, 2015

VIA HAND DELIVERY AND ECFS

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

Re: *Applications of AT&T Mobility Spectrum LLC, Tampnet Inc., Tampnet Licensee 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:

Pursuant to the instructions set forth in the Commission's General Information Request dated October 23, 2015 ("Request") and the Protective Order adopted in this proceeding, enclosed please find the response of Tampnet, Inc. to the Request. At the direction of the Request and the Protective Order, two unredacted copies of this response are being filed by hand with Matt Warner of the Wireless Telecommunications Bureau. One unredacted copy of this 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 counsel for Tampnet.

Sincerely,



K.C. Halm

cc: Scott Patrick
Kate Matraves
Jim Bird
Kathy Harris
Matt Warner

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Applications of AT&T Mobility Spectrum LLC,) WT Docket No. 15-255
Tampnet Inc., Tampnet Licensee 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)

**RESPONSE OF TAMPNET INC. TO
GENERAL INFORMATION REQUEST DATED OCTOBER 23, 2015**

November 13, 2015

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Response of Tampnet Inc. to General Information Request Dated October 23, 2015

November 13, 2015

Introduction

In response to the letter dated October 23, 2015 from Roger C. Sherman, Chief, Wireless Telecommunications Bureau, and the accompanying General Information Request (“Information Request”), Tampnet Inc. (“Tampnet” or the “Company”) provides the following answers and responsive documents, as applicable. Unless otherwise defined herein, capitalized terms shall have the meanings set forth in the Definitions section of the Information Request.

Tampnet has based its responses on a review of available documents that are reasonably likely to contain responsive information and on inquiries of those individuals and available sources that are likely to have relevant information. In certain cases, Tampnet does not maintain in the ordinary course of business some of the information requested, or does not maintain the information in the precise manner requested.

The narratives, attachments and submitted data contain material that is extremely sensitive from a commercial, competitive and financial perspective, and that, in the normal course of its business, Tampnet would not reveal to the public, to its competitors or to other third parties. Tampnet is submitting these responses on a Highly Confidential basis pursuant to the Protective Order issued in this proceeding on October 23, 2015.¹ Redacted submissions are marked, “**REDACTED –FOR PUBLIC INSPECTION,**” and are being filed electronically in the Commission’s Electronic Comment Filing System (“ECFS”). In these public redacted submissions, Tampnet has redacted Highly Confidential Information and marked the redactions with “[**BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION**] ... [**END TAMPNET HIGHLY CONFIDENTIAL INFORMATION**].” The Highly Confidential, unredacted submissions are marked “**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WT DOCKET NO. 15-255 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**” and are being delivered to the Secretary, with additional copies being delivered to Staff, as instructed in the Information Request and Protective Order.

Any inadvertent inclusion of material subject to the attorney-client, attorney work-product, or other applicable privilege does not constitute a waiver of that privilege. Tampnet requests the return or destruction of all confidential material at the conclusion of this proceeding.

¹ *Applications of AT&T Mobility Spectrum, LLC, Tampnet Inc., Tampnet Licensee 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, Protective Order DA 15-1212 (October 23, 2015) (“Protective Order”).

RESPONSES

1. REQUEST:

On page 5 of the Company’s Public Interest Statement, the Applicants claim that “[u]pon close of the transaction Tampnet will aggressively upgrade the existing 2G network and deploy a Gulf-wide 4G/LTE network that will permit Tampnet to offer robust and reliable 4G service to the oil and gas industry, its resellers and its roaming partners in this market.” For the Relevant Area provide:

- a. A detailed discussion of the Company’s plans to provide high-quality, high-speed wireless broadband services, including a detailed description of the Company’s current and planned deployment of 4G/LTE, which identifies the spectrum bands and the total amount of spectrum to be used for 4G/LTE deployment.*

TAMPNET RESPONSE:

Tampnet Plans to Deliver High-Quality, High-Speed Wireless Broadband Services

Tampnet Inc. (“Tampnet” or “Company”) is a Louisiana-based wireless infrastructure provider with the first-to-market low latency, high-speed WiMAX (World Interoperability for Microwave Access and as referenced in this document, 3.65 GHz spectrum) network in the Gulf of Mexico (“GoM”). Tampnet’s wireless infrastructure exploits the power of “converged IP” (the carriage of different types of traffic such as voice, video and data over a single Internet Protocol-based network) in remote areas, such as the GoM, that are accustomed to low capacity and high latency performance from satellite networks.

Tampnet’s proposed acquisition of spectrum assets, and its associated network deployment plans, will permit the Company to pursue its mission of delivering a robust, reliable high-quality terrestrial network with high capacity and low latency to deliver a better consumer experience to current and prospective customers with offshore assets operating in the GoM. Tampnet’s planned mobile broadband and high-capacity wireless network will enable our customers to rely on Tampnet’s network-based services to improve the health, safety, quality, operational efficiency and welfare of persons involved in their offshore operations by the use of bandwidth-intensive applications such as high definition video, video conference call, and machine-to-machine technologies that allow both wireless and wired systems to communicate with other devices of the same type communications.

Tampnet, and its parent company Tampnet AS, currently operate two offshore, high capacity communication networks which serve more than 250 Oil and Gas (“O&G”) platforms, Floating Production Storage and Offloading units (“FPSOs”) and exploration rigs in the GoM and the North Sea. In total, Tampnet and its parent have deployed, installed and currently operate a redundant subsea infrastructure network of 2,500 km fiber and approximately 100 radio links. The Company’s experience (and that of its parent) in deploying high-capacity networks in these unique environments demonstrates that Tampnet can successfully deploy the planned 4G/LTE network capabilities in the GoM in a manner that will meet the demands of consumers of wireless data and voice services who are working in the offshore O&G, maritime, commercial and government sectors operating in the GoM.

Tampnet’s Current and Planned Deployment of 4G/LTE Network Capabilities

Tampnet will deploy a high capacity broadband mobile network in the GoM with an estimated sixty (60) cell site locations (Figure 1), [BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

Reallocation of GSM (Global System for Mobile Communications) spectrum (Block A and B) [BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION] will provide higher bandwidth and throughput options for Tampnet’s planned 4G/LTE network, which will in turn benefit our customers.

Tampnet’s proposed deployment of an LTE-based network will utilize Evolved Universal Terrestrial Radio Access Network (E-UTRAN) architecture, as defined in 3GPP Technical specifications 36.300 and 23.401. Figure 1 (below) illustrates the anticipated network coverage of the planned LTE network using a propagation model simulation which identifies coverage areas for the fully deployed LTE network. Offshore platforms (depicted as small squares typically at center of propagation rings) will be the base station sites. This model shows that areas in green will provide for a highly reliable, high throughput (multi-megabit per second) network connection. As a customer transitions into the blue areas in the model, their network availability and throughput would decrease.

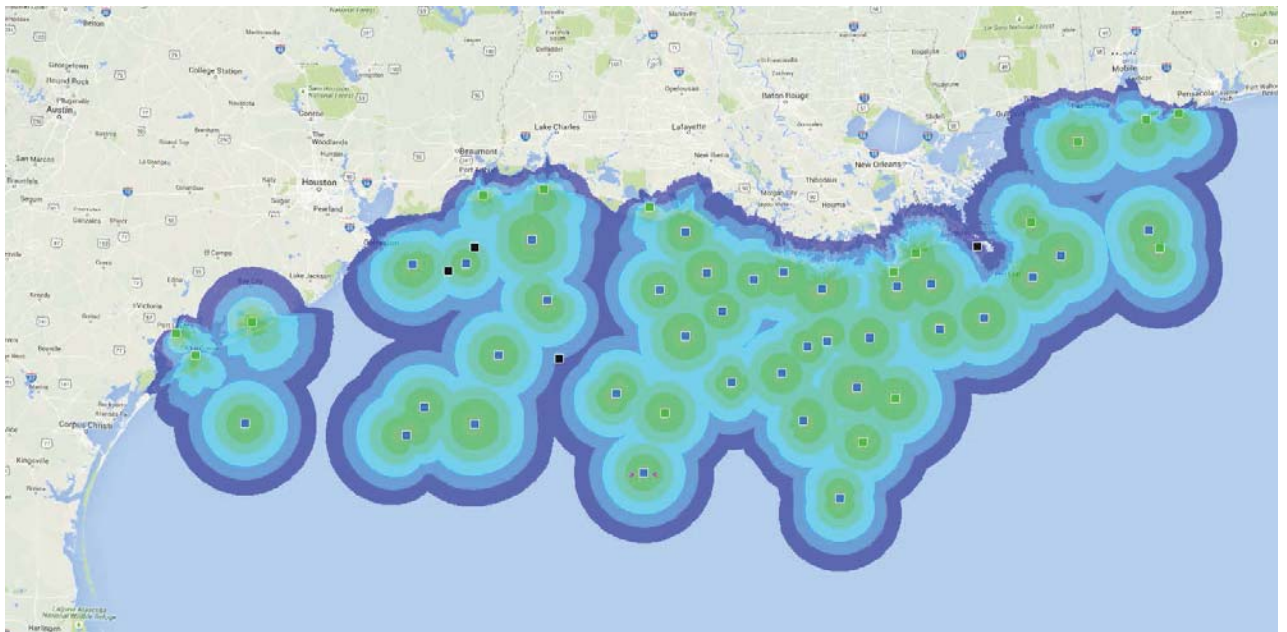


Figure 1 - Tampnet Proposed LTE Network Deployment

The coverage area provided by the existing GSM network is shown in Figure 2. As demonstrated by the network coverage area illustrated on each map, the coverage area shown in Figure 1 (which reflects the anticipated coverage once the LTE network is fully deployed) is significantly greater than the coverage area of the existing GSM network, as shown in Figure 2 (below). Thus, deployment of the LTE network will expand network coverage and capabilities to

more areas in the GoM. Additionally because the existing GSM network offers maximum data rates of only approximately 238 kilobits per second it is not capable of meeting the demands of the high-bandwidth users in this market. The planned upgrade of the GSM network is necessary to meet customer demand for networks that can deliver sufficient bandwidth and capacity to support high throughput and bandwidth-intensive applications, like those used by entities working in the O&G exploration and production market in the GoM.

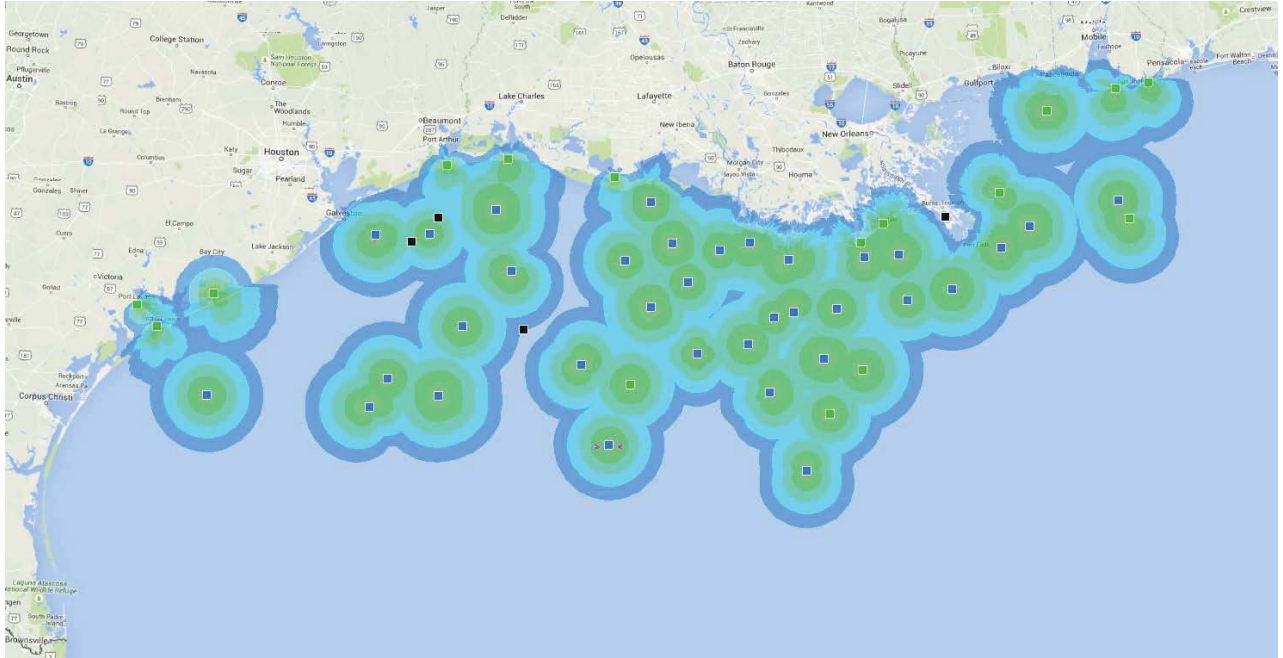


Figure 2 – Existing Broadpoint GSM Network

[BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

[END

TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

The planned LTE network will also address the current call handoff limitations associated with the Tampnet's current WiMAX network, which does not allow for a clean handoff between sectors. This means that when a customer travels between base stations, voice communications are terminated and the call has to be reestablished upon entering the new base station's coverage. LTE technology allows for transitioning between base stations without dropped calls.

[BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

[END TAMPNET HIGHLY

CONFIDENTIAL INFORMATION].

The remote, harsh environment of the GoM and the high expense of helicopters and marine vessels used for transportation to and from sites in the GoM create the need for reliable remote solutions. Tampnet's network will be designed as a dual frequency, high channel bandwidth network from its inception to ensure delivery of the best possible LTE, LTE-Advanced (and beyond) services in the future with minimal offshore intervention. Tampnet will use the Cellular 850 MHz and AWS-1 spectrum for its overbuild and upgrade of Broadpoint's GSM network and Tampnet's private WiMAX network to deploy a high capacity LTE network.

Notably, Tampnet will continue to maintain and operate the existing 2G network, coverage and capabilities while the 4G/LTE network is being deployed, **[BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]**

[END TAMPNET

HIGHLY CONFIDENTIAL INFORMATION]

Spectrum Bands and Total Amount of Spectrum to be Used for 4G/LTE Network

[BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

² See, e.g., <http://www.3gpp.org/technologies/keywords-acronyms/97-lte-advanced>.

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[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

- b. *A detailed description of how the Company would use the spectrum subject to the Proposed Transaction to provide a 4G/LTE network, on a standalone basis and/or in conjunction with any other spectrum holdings.*

TAMPNET RESPONSE:

Tampnet will use the acquired spectrum (Cellular Block A and B, AWS-1 Block B and C) to build a highly reliable, high speed broadband mobile network for the GoM that delivers higher throughput and is much more flexible and accommodating for mobile units than its existing WiMAX network. Tampnet intends to build a network in the GoM similar to the network Tampnet’s parent company (Tampnet AS) has deployed in the North Sea, with great success. The parent company’s successful LTE network in the North Sea uses the EU 800MHz, 900MHz and 1800MHz spectrum bands to provide services (3GPP bands 3, 8 and 20). Tampnet AS uses 20MHz channels in the 1800MHz band, and 15MHz channels in the 800MHz “coverage” band offshore in the North Sea. [BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

[END TAMPNET HIGHLY CONFIDENTIAL
INFORMATION]

Building off of its parent company’s experience in the North Sea, Tampnet will use the following spectrum deployment strategy for its LTE services in the GoM. [BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

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[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

c. *A detailed explanation of why the Company needs more than one-third of the suitable and available spectrum below 1 GHz for the provision of mobile wireless services.*

TAMPNET RESPONSE:

Below 1 GHz Spectrum Is Well Suited to Address Bandwidth Intensive Applications and Services That Will be Deployed Over Tampnet's 4G/LTE Network

According to one recent study, mobile data traffic globally has increased by 55% in one year from Q1 2014 to Q1 2015,³ and is expected to continue into the future. This exponential growth in mobile traffic is also occurring in the offshore markets in the GoM. For example, major O&G operators (Shell, BP, Chevron, etc.) are developing integrated operations whereby control rooms located in offshore rigs are mirrored in onshore sites. This approach enables O&G operators to remotely control production and operations. This remote access and control strategy has the benefit of moving people out of the harsh, offshore environment to safer onshore sites. However, this strategy can only occur by utilizing high bandwidth applications such as high definition video, video conference call, and M2M computing. Each of these applications require highly reliable, high bandwidth networks capable of delivering these services.

[BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

³ See Ericsson Mobility Report 2015 at p. 11 (available at: <http://www.ericsson.com/mobility-report>).

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[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

- c. A detailed description of the Company's plans for upgrading the existing network, and the Company's timeline for such an upgrade.*

TAMPNET RESPONSE:

As discussed in its response to Q.1a, Tampnet will deploy a high capacity broadband mobile network in the GoM with an estimated sixty (60) cell site locations (Figure 1), **[BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]**

[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

e. A detailed discussion whether the Proposed Transaction includes a transition of Broadpoint’s existing customers to the Company, and, if so, the content of such transition plans.

TAMPNET RESPONSE:

Customers Will Not be Adversely Impacted by the Transaction

Broadpoint has two groups of customers: wholesale customers and roaming customers. Neither category of customers will be assigned directly to Tampnet. However, Tampnet will be actively engaged with Broadpoint’s existing wholesale and roaming customers to ensure that such customers can continue to receive services over Tampnet’s upgraded network facilities without a degradation in service. Specifically, upon closing of the Proposed Transaction, Tampnet will negotiate with wholesale and roaming customers for their continued access and use of the existing Broadpoint network, and access and use of Tampnet’s planned future LTE upgraded network-based services.

Further, as previously explained, Tampnet is entering into a roaming agreement with [BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION] All other wholesale customers will benefit [BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION] [END TAMPNET

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HIGHLY CONFIDENTIAL INFORMATION]. If wholesale customers wish to take advantage of location specific LTE upgraded network services [**BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION**] **[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION]**], Tampnet will upgrade those services from GSM to LTE upon request.

Roaming Customers serviced directly by Broadpoint will be given the option of [**BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION**] **[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION]**] location specific LTE upgraded network services. Tampnet already has a Master Service Agreement (“MSA”) in place with Broadpoint’s largest Roaming Customer and can quickly negotiate MSAs with other customers.

Tampnet’s ability to provide enhanced wholesale services to other carriers is evidenced by the parent company’s operations in the North Sea, where this model has been successfully deployed through various technologies since the parent company began operations in 2001. The majority of the resellers currently operating in the North Sea also have a significant and (often) larger presence in the GoM. As such, Tampnet intends to expand these relationships with existing resellers in the North Sea to offer similar services to these same resellers (or their affiliates) in the GoM. With this business model, and the anticipated increase in data traffic from Tampnet’s customers, resellers and roaming partners, it is expected that significant spectrum resources will be required. Additionally, other industries and user types such as environmental monitoring, merchant navy, coast guard, fisheries, cruise, weather data services and leisure marine traffic will be able to gain access to the planned network infrastructure.

The steps outlined above demonstrate that current wholesale and roaming customers will continue to receive the same access to services and the network in place today, as well as the benefit of the planned upgraded 4G/LTE network, without a loss or degradation of services.

Provide all documents relied on in preparing the responses to 2(a)-2(e).

Relevant documents which the Company relied upon in preparing the responses to 2(a)-2(e) are attached at Bates Ranges Tampnet-FCC-1-000001 through Tampnet-FCC-1-000485.

REQUEST:

Provide a map of where Tampnet plans on deploying a Gulf-wide 4G/LTE network and/or upgrading the existing network, both with respect to the spectrum to be acquired from Broadpoint, and the spectrum to be leased from AT&T.

TAMPNET RESPONSE:

[BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

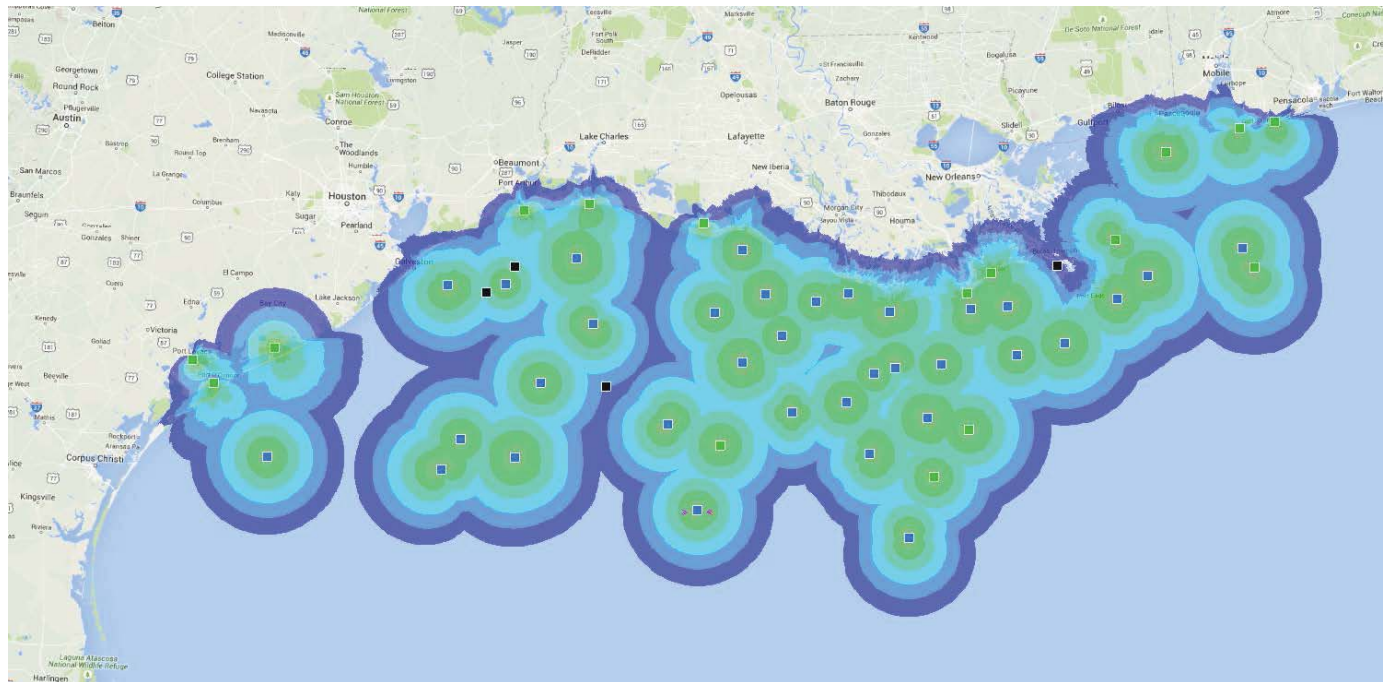


Figure 13 - Full GoM Coverage
Showing Combined AWS-1 Coverage and 850 MHz Coverage Acquired From Broadpoint,
and Coastal Zone Coverage Using Leased Spectrum From AT&T.

[BEGIN TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

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[END TAMPNET HIGHLY CONFIDENTIAL INFORMATION]

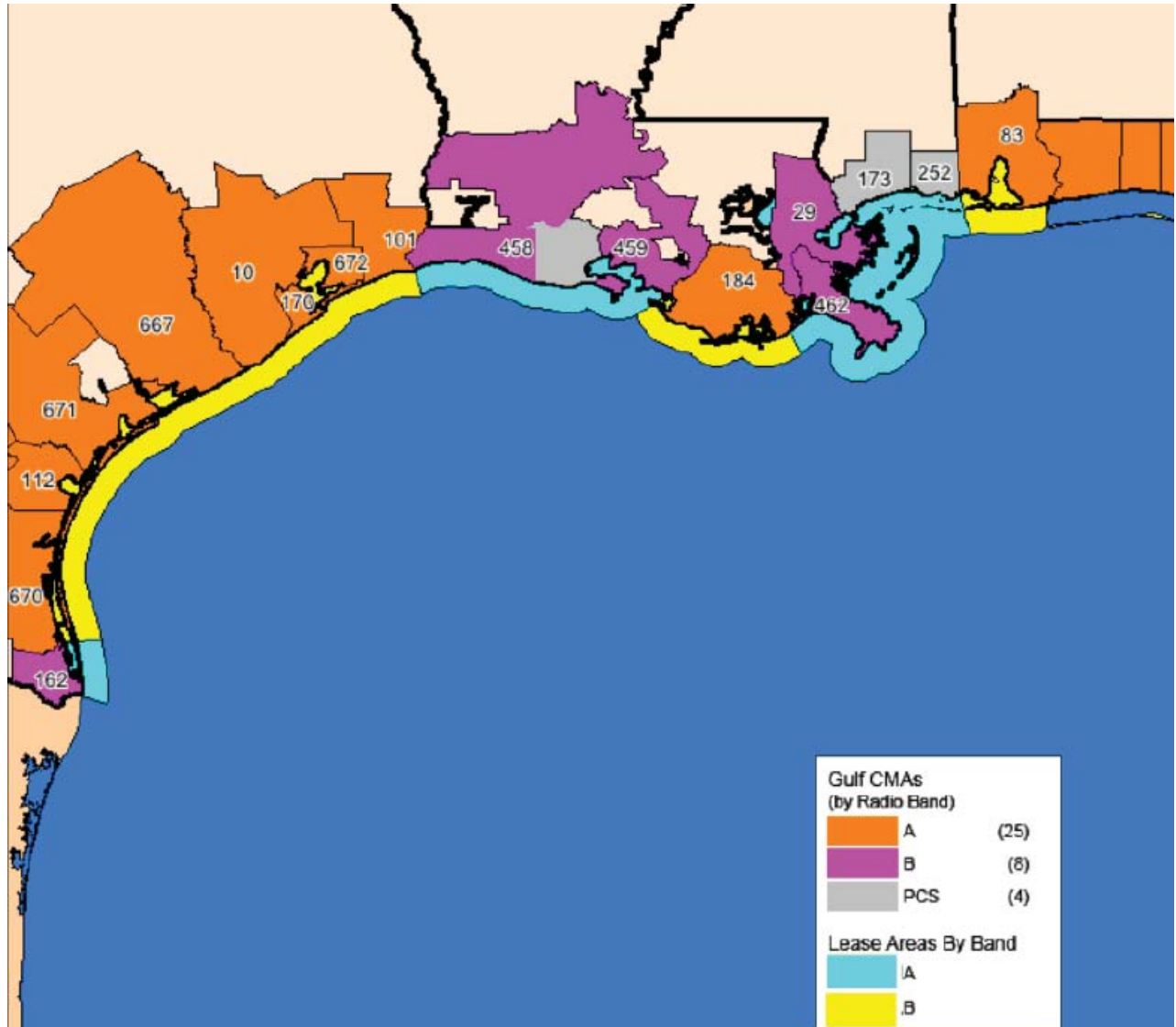


Figure 16 - Spectrum Lease Areas and Division of the Blocks A and B of the 850 MHz Spectrum

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Bates Numbers Tampnet-FCC-1-000001 through Tampnet-FCC-1-000485 have
been redacted as
Highly Confidential Information