

# COVINGTON

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**By ECFS and Electronic Mail**

November 13, 2015

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

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

Dear Ms. Dortch:

On November 12, 2015, Dick Wiley and Wayne Johnsen of Wiley Rein, counsel to JPMorgan Chase & Co. ("JPMC"), and the undersigned, counsel to LightSquared Subsidiary LLC ("LightSquared"), met by telephone with Louis Peraertz, legal advisor to Commissioner Clyburn, and in person with Brendan Carr, legal advisor to Commissioner Pai.

During the meetings the parties explained the proposed transaction, the new owners and proxy arrangement, and how grant of the above-captioned Applications, which were unopposed, will allow LightSquared to emerge from bankruptcy, consistent with the broad aims of the Bankruptcy Code, the Communications Act, and the Commission's rules and policies. The parties added that LightSquared's reorganization and emergence from bankruptcy will advance the public interest and benefit consumers by giving the company the financial resources to work with the Commission and other stakeholders to fully utilize this mid-band spectrum for various uses. The parties also noted that the proposed transaction enables the Commission to strengthen the wireless market with no competitive harms by giving the reorganized company access to new financing that will enhance its ability to maintain existing services and (subject to any required approvals) to offer innovative new services that can help the country transition to next-generation 5G services. Lastly, the parties emphasized that prompt Commission approval was necessary in order for the company to emerge successfully from bankruptcy.

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Please direct any questions to the undersigned.

Respectfully submitted,

/s/

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