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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
MARC SOBEL	)	
	)	
Applicant for Certain Part 90 Authorizations in the Los Angeles Area and Requestor of of Certain Finder's Preferences	)	**WT DOCKET NO. 97-56**[1]
	)	
MARC SOBEL AND MARC SOBEL d/b/a AIR WAVE COMMUNICATIONS	)	
	)	
Licensee of Certain Part 90 Stations in the Los Angeles Area	)	

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION

Marc D. Sobel ("Sobel") hereby offers this supplement to his June 7, 2002, *Petition for Reconsideration* in the above-captioned proceeding.

I. INTRODUCTION

1. One of the major points made in Sobel's *Revised Request for Inquiry and Investigation* ("*RFI*") is that the Wireless Telecommunications Bureau ("WTB")[2] has engaged in a pattern of discrimination and selective prosecution against Sobel and Kay. Throughout the time the WTB was vigorously investigating and prosecuting Kay and Sobel for a number of alleged violations, it turned a blind eye on and a deaf ear toward instances of similar and usually much worse misconduct by several licensees whose misconduct was reported by Kay and Sobel. See, e.g., *Petition for Reconsideration* at ¶ 7; *RFI* at pp. 17-27. These charges were fully and conclusively demonstrated through sworn testimony, declarations under oath, and/or

[1] Although initially submitted under the caption for WT Docket No. 97-56, this issues addressed in this pleading are entirely separate and do not depend on the ultimate outcome of that proceeding. See paragraph 11, below.

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documentary evidence. It is beyond curious that these wrongdoers, whose violations the WTB continues to ignore, were informants, complainants, or litigants against Kay and Sobel and/or their business competitors.

2. This history of unjustified discrimination and selective prosecution should be, in and of itself, a serious concern for the Commission. But this problem, unfortunately, is not merely historical. It is a continuing and ongoing problem. To date neither the WTB nor the newly-established Enforcement Bureau has taken any enforcement action whatsoever against the parties and violations described in *RFI*. Beyond that, new instances of disparate and selective treatment abound. The purpose of this supplement is to call to the Commission's attention but a few examples of more recent matters presented to the WTB and/or the Enforcement Bureau that continue to be treated in the same way, namely, to be ignored. Thus, not only do the past matters continue to go unaddressed, but the discriminatory conduct continues and worsens even as to new matters.

II. EXAMPLES OF CURRENT AND ONGOING DISCRIMINATION

A. S & L Teen Hospital Shuttle

3. On May 13, 1999, Kay filed a *Petition to Dismiss or Deny Application and Request to Cancel and Purge Authorization* in connection with Conventional Business Radio Service Station WIJ767. The application, filed in the name of SLTHS, ostensibly a corporation, sought reinstatement of an expired license that had been issued to S & L Teen Hospital Shuttle, also represented to be a corporation, even though there is no record of either such corporation ever having existed. Kay presented prima facie evidence of an apparent unauthorized transfer of control of the license by one of the principles of a former partnership, one Steve Sawhill. The Commission, while declining Kay's request that the reinstatement application be dismissed and

[2] Except where the context clearly requires otherwise, references to the WTB also include the former Private Radio Bureau.

the license declared null and void, did refer the apparent unauthorized transfer of control to the Enforcement Bureau for investigation. Attachment No. 1 hereto is a copy of the November 13, 2001, letter sent by the Enforcement Bureau seeking from Mr. Sawhill, seeking an explanation for the irregularities. Mr. Sawhill failed to respond to this letter in the time prescribed, and the Enforcement Bureau sent him a follow-up reminder. A recent status check by undersigned counsel with Enforcement Bureau staff confirmed that, to date, Mr. Sawhill has not responded in any way to the initial Section 308(b) request or to the follow-up letter.

4. The WTB launched a major enforcement action against Kay, a matter that later enveloped Sobel as well, because of Kay's alleged violation of Section 308(b) in connection with a letter of inquiry from Commission staff. In point of fact, Kay timely responded to the Commission's inquiry, seeking extensions of time and engaging in correspondence through legal counsel seeking to advance legal objections to certain aspects of the request and attempting to negotiate its scope. Nevertheless, the Commission, at the Bureau's prompting, launched license revocation proceedings against Kay, principally because he allegedly failed to provide information sought in the 308(b) request. Regardless of one's view of the propriety of initiating that proceeding or of the Commission's ultimate resolution of the matter, it is difficult to square the aggressive actions against Kay, who was actively engaged with the Commission staff regarding the request, with its seeming total lack of concern with a licensee who simply ignores the Commission's repeated requests for information. It is highly suspicious, moreover, that Mr. Sawhill's conduct was brought to the Commission's attention by Kay. The pattern is an all too familiar one.

B. <u>National Science and Technology Network, Inc.</u>

5. Despite its official-sounding name, National Science and Technology Network, Inc. ("NS&TN") is nothing more than the corporate incarnation of Mr. Al Hoffman, one of Sobel's and Kay's competitors in the Los Angeles mobile radio communications market. Nearly

a year ago, on September 24, 2001, Kay submitted an informal letter complaint to the Enforcement Bureau (copy appended as Attachment No. 2 hereto) describing in specific detail violations and improper conduct by NS&TN, including unlicensed operations, violation of Subpart L protection criteria, abuse of process, misrepresentation, and lack of candor. Attachment No. 3 hereto is a copy of Kay's July 30, 2002, follow-up letter urging the Enforcement Bureau to advise him what, if anything, has been done on this matter. The Enforcement Bureau apparently is ignoring both Kay's original letter of nearly a year ago as well as his follow-up letter.

6. The staff's total lack of interest in the specific allegations against NS&TN stands in stark contrast with the major offensive that was launched against Kay and Sobel based on extremely general, non-specific "complaints" from obviously biased sources. Indeed, when it came time for trial in the Kay revocation matter, the Bureau presented ***none*** of the witnesses it had previously claimed justified the prosecution. Moreover, the Bureau was ultimately unable to present evidence and/or prove its case regarding the violations alleged by these so-called complainants, e.g., abuse of process, malicious interference, loading violations, construction violations, etc. It is thus difficult not to be highly suspicious when the staff effectively yawns when Kay presents a specific very complaint against one of his competitors.

C. <u>Mobile Relay Associates</u>

7. A similar—and perhaps even more egregious—matter is the total inaction by both the WTB and the Enforcement Bureau on this matter. Attachment No. 4 hereto is a copy of Kay's December 4, 2001, *Petition for Enforcement Action* tendered with respect to Mobile Relay Associates and Mobile Radio Associates, Inc. (collectively "MRA") and their principal, Mr. Mark J. Abrams. Attachment No. 5 hereto is a copy of Kay's March 5, 2002, *Supplement to Petition for Enforcement Action*. Attachment No. 6 hereto is a copy of Kay's April 23, 2002, *Second Supplement to Petition for Enforcement Action*. Finally, Attachment No. 7 hereto is a

copy of Kay's August 1, 2002, *Supplement to Petition for Reconsideration* in an ancillary matter, FCC File No. 0000644810,[3] including further documentation and sworn verification of some of the facts alleged in the afore-mentioned pleadings.

8. The pleadings described in paragraph 7, above, and appended hereto as Attachment Nos. 4-7, demonstrate and fully support the assertion that MRA and Mr. Abrams have engaged in misrepresentation to and lack of candor with the Commission and also have engaged in an abuse of the Commission's licensing process. Specifically, MRA and Abrams tendered several assignment of license application even though they were fully aware that the subject licenses were no longer valid, having been permanently removed from service and operation years prior to submission of the assignment applications. Mr. Abrams falsely certified that the station was timely constructed and in operation. Such conduct constitutes blatant misrepresentation and lack of candor (Attachment No. 5, Section III.A, pages 8-10) as well as abuse of the Commission's application process (Attachment No. 5, Section III.B, pages 10-12). These allegations are fully documented and conclusively demonstrated. Indeed, MRA and Abrams have not, to date, offered any denial whatsoever of the basic facts or any contrary demonstration on the merits.

9. The WTB and the Enforcement Bureau have simply ignored the MRA matter. There is no apparent reason why such egregious misconduct would be simply ignored, unless it is the fact that it was presented by Kay against a competitor of Kay and Sobel.

C. CONCLUSION

10. As stated in the June 7, 2002, *Petition for Reconsideration*, the Commission has never yet addressed the specific merits of the allegations in the *RFI*. Sobel assumes that such a failure by the staff—whether it be neglect or intentional discrimination—is neither authorized

[3] The *Petition for Enforcement Action* FCC File No.

nor condoned by the Commission, and so the Commission presumably would want to carefully investigate and address these matters. But the fact that this conduct continues to this day, and apparently will continue until such time as the Commission discharges its duty to police the actions of its staff, an even greater urgency exists. The Commission is urged to initiate an appropriate investigation without further delay. In the meantime, the Commission should expressly direct the WTB and the Enforcement Bureau to act on the specific matters outlined above, as well as numerous other matters presented by Kay and Sobel that have gone unattended.

11. Finally, Sobel wishes to make clear that this matter is entirely separate from the license revocation proceeding itself, WT Docket No. 97-56. Sobel has submitted a timely judicial appeal from the Commission's action in that matter insofar as it found adversely to Sobel on the issues of APA compliance, unauthorized transfer of control, lack of candor, and insofar as it imposed the license revocation sanction. But regardless of the outcome of that appeal and the ultimate resolution of WT Docket No. 97-56, Sobel will continue to seek the relief sought herein, namely, a thorough investigation of the conduct of Commission staff and an end to the discriminatory treatment. It is hoped that the Commission too would see these allegations as serious enough to warrant its attention and action, regardless of the outcome of the pending judicial appeals.

Respectfully submitted September 17, 2002:

Marc D. Sobel

By: Robert J Keller

Robert J. Keller
Law Offices of Robert J. Keller, P.C.
PO Box 33428 – Farragut Station
Washington, D.C. 20033-0428
202-223-2100

ATTACHMENT NO. 1

ATTACHMENT NO. 1

ATTACHMENT NO. 1

FEDERAL COMMUNICATIONS COMMISSION
Enforcement Bureau, Investigations and Hearings Division
Washington, D.C. 20554

November 13, 2001

In Reply Refer to:
EB-01-IH-0450 WHK

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Steve Sawhill
S&L Teen Hospital Shuttle
P.O. Box 2088
Canoga Park, CA 91306-2088

Re: Private Land Mobile Station WIJ767

Dear Mr. Sawhill:

By *Memorandum Opinion and Order*, FCC 01-114, released April 12, 2001, a copy of which is attached, the Commission denied an Application for Review filed by James A. Kay, Jr., challenging the grant of a license for Private Land Mobile Station WIJ767 to S&L Teen Hospital Shuttle ("SLTHS"). In so doing, however, the Commission referred one of Mr. Kay's claims, involving the matter of a possible unauthorized transfer of control stemming from the withdrawal of Leslie Miller from the SLTHS partnership in 1998, to the Enforcement Bureau for investigation.

We have made no determination regarding SLTHS's compliance with Section 310(d) of the Communications Act of 1934, as amended, 47 U.S.C. §310(d), which generally requires prior Commission consent to the transfer of control of Commission authorizations. In order that we may be more fully informed, SLTHS is directed to provide, in writing within 30 calendar days of the date of this letter, a full and complete explanation of the circumstances underlying the referenced withdrawal of Leslie Miller from the SLTHS partnership in 1998 and SLTHS' alleged failure to obtain timely Commission consent to the transfer of control of Station WIJ767 that may have resulted therefrom.

SLTHS's response shall be signed by an officer, director, or general partner of SLTHS. The response shall be directed to:

William Knowles-Kellett, Esq.
Federal Communications Commission
Enforcement Bureau, Investigations & Hearings Division
445 12th Street, S.W.
Washington, DC 20554

In addition, SLTHS shall direct a copy of its response to Mr. Kay's counsel at the address shown below. Mr. Kay will thereafter be accorded 15 calendar days to reply in writing to SLTHS' response, with a copy to SLTHS.

If you have any questions concerning this matter, you may contact Mr. Knowles-Kellett at (717) 338-2505.

Sincerely,

Charles W. Kelley
Chief, Investigations and Hearings Division
Enforcement Bureau

cc: Robert J. Keller, Esq. (w/o attachment)
4200 Wisconsin Ave., N.W.
Suite 106-Box 223
Washington, D.C. 20016-2157

ATTACHMENT NO. 2

ATTACHMENT NO. 2

ATTACHMENT NO. 2

LAW OFFICES
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Of Counsel to:
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Washington, D.C. 20036-5803

September 24, 2001

Charles W. Kelley, Chief
Investigations and Hearings Division
Federal Communications Commission
445 Twelfth Street, S.W. – Suite 3-B431
Washington, D.C. 20554

In re: National Science and Technology Network, Inc.

Dear Mr. Kelley:

This letter of complaint is tendered on behalf of James A. Kay, Jr., to call to the attention of the Commission apparent violations of the Communications Act and of the Commission's rules, regulations, and policies by National Science and Technology Network, Inc. ("National"), a commercial mobile radio service licensee operating in the Los Angeles, California area.

Request for Confidentiality. As has apparently been the Commission's practice with complaints such at these—at least this has been Mr. Kay's experience regarding various complaints that have in the past been tendered against him, he respectfully requests: (a) that his identity be held in confidence, and (b) that he be kept informed of the progress of any ensuing investigation. Mr. Kay may, at a future date, choose to use some or all of this information in the context of a formal protest against one or more National applications, and he will at that time fully comply with all applicable *ex parte* requirements.

Introduction. As explained herein, it appears that National is operating unlicensed transmitters at a location from which it would, in any event, be precluded from obtaining a Commission authorization. It is also reasonable to suspect that this is part of an intentional scheme on National's part to circumvent the applicable legal restrictions, and it therefore constitutes abuse of process, misrepresentation, and lack of candor. Thus, there is ample reason to question National's continued basic qualifications as a Commission licensee.

Description of Referenced Transmitter Sites. This complaint refers to mobile radio facilities at two transmitter sites. One is near Blackstar Canyon Rd., Corona (Orange) California; approximate geographic coordinates: N. Lat. 33-47-48, W. Long. 117-37-25 (hereinafter referred to as the "Blackstar Canyon" site). The other is near Sierra Peak, Corona (Orange) California; approximate geographic coordinates: N. Lat. 33-51-00, W. Long. 117-39-08 (hereinafter referred to as the "Sierra Peak" site.

Unlicensed Operation. National has for some time been operating and continues to operate unlicensed transmitters in the 470-476 MHz frequency range at the Blackstar Canyon site. Upon request, we will provide your staff with signed declarations of one or more individuals with personal knowledge of these operations, but we respectfully suggest this would be better confirmed directly through an inspection by Commission personnel. A careful search of the Commission's database does not reveal any authorization by National for operations at this site in the 470-476 MHz frequency range. Based on these facts, National has violated and continues to violate Section 301 of the Communications Act of 1934, as amended, 47 U.S.C. § 301, and Section 1.903 of the Commission's Rules and Regulations, 47 C.F.R. § 1.901.

Violation of Subpart L Protection Criteria. The unlicensed operations described above also violate the television station protection criteria for Subpart L stations set forth in Sections 90.307 and 90.309 of the Commission's Rules, 47 C.F.R. §§ 90.307 & 90.309, because the Blackstar Canyon site is less than 90 miles from TV Channel 15 at San Diego, California. It appears that National holds authorizations for several for 470-476 MHz facilities at a transmitter site with temporary base (FB6T), temporary control (FX1T), and/or temporary centralized trunked relay (FB8T) stations at the Sierra Peak site.[1] National perhaps will contend that the Blackstone Canyon site is encompassed in the area where it is permitted to establish temporary facilities pursuant to these Sierra Peak authorizations, but this is not the case. The general authority to establish temporary facilities does not override specific co-channel and adjacent-channel protection criteria. The separation requirement with respect to TV Channel 15 at San Diego applies just as much to temporary transmitters as to permanent ones.

Abuse of Commission Processes, Misrepresentation, and Lack of Candor. The Commission may take official notice that National is an entity with long-standing and extensive experience in the land mobile radio service industry, including the intricacies of FCC licensing and technical regulations and policies. It is therefore reasonable to suspect, if not assume, that the above-described irregularities are not a mere inadvertent misconstruction of the requirements. The Bureau should therefore investigate the possibility that National knew full well exactly what it was doing. Specifically, National knew that it could not licensed these facilities at Blackstone Canyon, so it instead licensed temporary facilities at Sierra Peak in order to do indirectly what the Commission's regulations prohibited it from doing directly.[2] If so, this would raise a substantial and material question whether National possesses the requisite character qualifications to remain a Commission licensee.

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[1] E.g., Stations WBP735, WIH415, WII525, WIJ490, WIJ596, WIK630, WIK632, WIK847, WIK992, WIL656, WIL770, WIM259, WIM470, WIM606, WPJX768, WPHK781, WPKR695, WPKW733, WPME693, WPME695, WPMK520, WPMM479, WPMM916, WPMP751, WPMP967, WPQI727, and WPSN281.

[2] Moreover, if this was such a scheme, it would violate the entire spirit as well as the letter of the temporary authorization policy. Clearly, the transmitters in such a scheme are intended as permanent, not temporary, and this constitutes yet an additional instance of misrepresentation and abuse of process.

Failure to Timely Construct and Operate Facilities. Even if the Bureau were to determine that National's misconstruction of the requirements was due only to negligent innocence, the continued validity of National's Sierra Peak authorizations are called into question. If the Sierra Peak facilities were licensed not for the purpose of providing service from Sierra Peak, but rather as a "hook" to justify placing temporary stations at Blackstone Canyon, we respectfully submit that National would not have met the requirement that its Sierra Peak facilities be timely constructed and placed into operation. The Bureau should carefully investigate the timing and configuration of the allegedly permanent stations at Sierra Peak. If it is determined that they were established solely as a false front for the unlawful temporary facilities at Blackstone Canyon, the Commission should declare the station licenses automatically canceled for failure to timely construct and place into operation, pursuant to Section 90.155 of the Commission's Rules, 47 C.F.R. § 90.155.

Conclusion. It is respectfully requested that the Bureau promptly and thoroughly investigate this matter and take appropriate enforcement action. Kindly refer any questions or correspondence regarding this matter to the undersigned

Very truly yours,

/s/ Robert J. Keller

Robert J. Keller
Counsel for James A. Kay, Jr.

ATTACHMENT NO. 3

ATTACHMENT NO. 3

ATTACHMENT NO. 3

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Of Counsel to:
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July 30, 2002

Charles W. Kelley, Chief
Investigations and Hearings Division
Federal Communications Commission
445 Twelfth Street, S.W. – Suite 3-B431
Washington, D.C. 20554

In re: National Science and Technology Network, Inc.

Dear Mr. Kelley:

On September 24, 2001, we tendered a letter complaint against the above-referenced licensee, National Science and Technology Network, Inc. ("National"), on behalf of James A. Kay, Jr. ("Kay"). a commercial mobile radio service licensee operating in the Los Angeles, California area. The complaint, a copy of which is attached for your convenient reference, alleged numerous violations, including unlicensed operations, violations of the protection criteria for Subpart L (470-512 MHz) stations, abuse of process, misrepresentation, and lack of candor.

That was more than ten months ago, but to date we have heard nothing in response to this complaint. Please advise us of the status of this matter.

Very truly yours,

/s/ Robert J. Keller

Robert J. Keller
Counsel for James A. Kay, Jr.

ATTACHMENT NO. 4

ATTACHMENT NO. 4

ATTACHMENT NO. 4

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Mark J. Abrams, Licensee	)	
(holder of 3 Title III authorizations)	)	
	)	
Mobile Relay Associates, Licensee	)	(See Attachment A)
(holder of 85 Title III authorizations)	)	
	)	
Mobile Relay Associates, Inc., Licensee	)	
(holder of 67 Title III authorizations)	)	

To: Chief, Enforcement Bureau

PETITION FOR ENFORCEMENT ACTCION

James A. Kay, Jr. ("Kay"), by his attorney, pursuant to Section 1.41 of the Commission's Rules and Regulations, 47 C.F.R. § 1.41, hereby respectfully requests that the Commission initiate appropriate enforcement action, including but not limited to investigation and license revocation proceedings, with respect to the above-captioned licensees, in support whereof the following is respectfully shown:

I. INTRODUCTION

1. Based on the information gleaned from the Commission's ULS database, it appears that Mobile Relay Associates ("MRA-P") is a partnership that holds some 85 Title III authorizations, and that Mobile Relay Associates, Inc. ("MRA-C") is a corporate entity holding some 67 Title III authorizations. These entities will be collectively referred to as "Mobile Relay," unless it is necessary to refer specifically to one or the other. Mobile Relay is owned and controlled by Mark J. Abrams ("Abrams"), and individual holding some three Title III authorizations. The specific call signs are set forth in Attachment A to this pleading. Many of the authorizations held by Mobile Relay are for land mobile radio service facilities in the Los Angeles, California area, the business in which Abrams is engaged.

2. Abrams and Mobile Relay have engaged in conduct that calls into serious question their continued basic qualifications to remain Commission licensees. Specifically, Abrams and Mobile Relay have filed numerous applications pursuant to Section 310(d) of the Communications Act, seeking Commission consent to the assignment of certain licenses to Mobile Relay. In many instances, the licenses for which such assignments were sought were no longer valid, having automatically expired due to permanent discontinuance of operations.[1] Insofar as Abrams knew or should have known the status of the licenses for which assignment was sought, it appears that Abrams and Mobile Relay have lacked candor with and made misrepresentations to the Commission and have also engaged in abuse of process.

II. THE INVALIDITY OF THE ASSIGNED LICENSES

A. The Assignment of License Applications

3. Over the past six months Abrams has been a party to at least seventeen assignment of license applications submitted to and approved by the Commission, specifically applications in which either the MRAP or MRAC has been the assignee. The Commission's attention is directed specifically to eight of these applications, listed in Table A.

Table A

File#	Call	Assignor	Filed
0000440491	WII345	Professional Express, Inc.	04/26/01
0000450505	WIF528	McAuley LCX Corp. dba Los Coyotes Country Club	05/07/01
0000473879	WIB815	BHL Enterprises, Inc. dba West Coast Roofing	05/29/01
0000473979	KNQ937	Bernier, Robert C.	05/29/01
0000531997	WSD94	J Schwartzman Mfg. & Supply dba J S Screw Mfg.	07/23/01
0000562462	WIJ226	El Redondo Termite Control, Inc.	08/16/01
0000586475	WII664	Fischbeck Construction	09/07/01
0000644810	WII622	Dray, Chas. & Cornelia dba Chino Hills Patrol	10/31/01

[1] Section 1.955(a)(3) of the Commission's Rules and Regulations provides: "Authorizations automatically terminate, without specific Commission action, if service is permanently discontinued." 47 C.F.R. § 1.955(a)(3). And Section 90.157 of the Rules, which specifically governs the licenses at issue in these assignment applications, provides: "Authorizations automatically terminate, without specific Commission action, if service is permanently discontinued." 47 C.F.R. § 90.157.

4. As to the three of the above-listed applications, Kay presents herein conclusive proof that authorizations had, at the time of the assignment applications, long since expired due to permanent discontinuance of operations.[2] As to the other five applications, Kay asserts, in good faith and on information and belief, that the same is also true. A single instance of this type of conduct would raise serious questions as to whether Abrams and Mobile Relay have misrepresented, lacked candor, and violated the integrity of the Commission's licensing process. But Kay here presents eight applications in which this appears to be true, three of which are conclusively proven. If the Commission were to examine all of the recent assignment applications in which Abrams, Mobile Relay, or an affiliate has been the assignee, it may well be discovered that this pattern extends beyond these eight applications.[3] We now turn to a demonstration that the last three entries listed in Table A (File Nos. 0000562462, 0000586475, and 0000644810) involve facilities that were most definitely permanently discontinued when the assignment applications were filed.

B. Station WIJ226 - FCC File No. 0000562462

5. The license for IG Station WIJ226, issued to El Redondo Termite Control, Inc. ("El Redondo Termite"), authorized operation of a community repeater on the base station frequency 508.0625 MHz at Saddle Peak. El Redondo Termite obtained service for this license

[2] Attachment B hereto is the sworn declaration of James A. Kay, Jr., verifying the factual allegations set forth herein of which he has personal knowledge. The assertions regarding licenses, applications, etc., are matters of which the Commission may take official notice and may verify by reference to its license and application records. In addition, several items of documentary support are attached hereto as exhibits and referenced in the pleading.

[3] The eight applications listed in Table A represent only a portion of the assignment applications filed by Mobile Relay in the past six months or so. Kay has limited this pleading to only those applications where he can prove or where can in good faith assert on information and belief that the subject authorizations were invalid at the time of the application. Kay has no belief or information one way or the other as to applications not listed on Table A, although the Commission may wish to expand the scope of its investigation to include all assignment applications involving Mobile Relay or Abrams.

from Motorola which owned and operated the Saddle Peak community repeater. In October 1993 customer accounts were sold to Kay by Motorola. {Ex. 1} On December 9, 1993, El Redondo Termite entered into a contract for service on 508.0625 MHz via Kay's private carrier facility, Station WIK375, located at Monte Nido, a site near Saddle Peak and with similar coverage. {Ex. 2} As part of these negotiations, El Redondo Termite agreed to cancel its community repeater license. El Redondo Termite executed an FCC Form 405A for that purpose on or about December 8, 1993. {Ex. 3} The At that point El Redondo Termite ceased operating on the Saddle Peak community repeater, and Motorola in fact removed that repeater from the Saddle Peak site late December 1993. The station was never reconstructed and El Redondo Termite has not, since that time, engaged in any operation pursuant to the license for WIJ226.[4] Thus, on December 8, 1993, El Redondo Termite agreed to cancel its authorization, executed an FCC Form 405A requesting formal cancellation from the FCC, and in fact permanently discontinued use of the station.

6. Section 90.157 of the Rules provides: "A station license *shall cancel automatically* upon permanent discontinuance of service." 47 C.F.R. § 90.157 (emphasis added). Section 1.955 makes clear that such licenses "automatically terminate, without specific Commission action." 47 C.F.R. § 1.955(3). Thus, the license for Station WIJ226 terminated in December 1993 and has been invalid since that time. It does not matter that the Form 405A was filed at a later date or that the Commission, for whatever reason, has not processed the Form 405A and purged the call sign from its database. Based on the above-quoted regulations, the automatic termination and cancellation of the authorization occurs at the time of permanent

[4] El Redondo Termite's subsequent operations on 508.0625 MHz were pursuant to Kay's private carrier Monte Nido authorization. Furthermore, on August 27, 1996, El Redondo Termite contacted with Kay to switch to LTR "trunked" service, and from that point no longer operated on 508.0625 MHz at all. {Ex. 4}

discontinuance. The subsequent submission of cancellation forms and updates to the database are mere formalities to reflect what has in fact already occurred.

7. Even if this were not the case, however, the WIJ226 authorization would also be deemed to have automatically expired and terminated in December of 1994, twelve months after operations on the station were terminated. Although automatic termination occurs at the time of permanent discontinuance, Section 90.155 of the Rules goes on to state that "any station which has not operated for one year or more is considered to have permanently discontinued." 47 C.F.R. § 1.157. As the owner of the repeater equipment at both Saddle Peak as well as Monte Nido, and as a co-channel licensee on 508.0625 MHz, Kay has personal knowledge of both the Saddle Peak site and Los Angeles area operations on 508.0625 MHz. Moreover, El Redondo Termite continues to be a customer of Kay to this day, and Kay is therefore intimately familiar with its land mobile radio operations. Kay definitively asserts, from his own personal knowledge, that El Redondo Termite has not at any time since December 1993: (a) reestablished the WIJ226 community repeater at Saddle Peak, or (b) operated on 508.0625 MHz in the same area except as a customer on Kay's private carrier station at Monte Nido from 1993 to 1996. The bottom line is that under any conceivable rendering of the facts, this authorization automatically terminated and became invalid years ago.

C. Station WII644 - FCC File No. 0000586475

8. The facts and the regulatory posture of Stations WII644, addressed in this section, and Station WII622, addressed in Section II.D, below, are largely the same as that set forth with respect to Station WIJ226, addressed in Section II.B, above. To the extent possible consistent with clarity, we will repeat the assertions and argument set forth in Section II.B, but will refer back to them in addressing the next two station.

9. The license for IG Station WII664, issued to Fischbeck Construction, Inc. ("Fischbeck"), authorized operation of a community repeater on the base station frequency 471.6625 MHz at Sierra Peak. Fischbeck obtained service for this license from Motorola which owned and operated the Sierra Peak community repeater. In October 1993 the repeater and customer accounts were sold to Kay by Motorola. This was part of the same arrangement whereby Kay also purchased the customers of Motorola's Saddle Peak community repeater. See ¶ 5, above. On January 11, 1994, Fischbeck entered into a contract for service on 471.6625 MHz via Kay's private carrier Station WIK727, also located at Sierra Peak. {Ex. 5} Fischbeck executed an FCC Form 405A for that purpose on or about January 11, 1994. {Ex. 6} Fischbeck ceased operating on the Sierra Peak community repeater, and Motorola in fact removed that repeater from the Sierra Peak site in late December 1993. The station was never reconstructed Fischbeck has not, since that time, engaged in any operation pursuant to the license for WII664. Fischbeck operated on Kay's private carrier system at Sierra Peak for approximately two years, after which he canceled service.

10. As the owner of the repeater equipment at Sierra Peak and as a co-channel licensee on 471.6625 MHz, Kay has personal knowledge of both the Sierra Peak site and Los Angeles area operations on 471.6625 MHz.[5] Kay definitively asserts, from his own personal knowledge, that Fischbeck has not at any time since December 1993: (a) reestablished the WII664 community repeater at Sierra Peak, or (b) operated on 471.6625 MHz in the same area except as a customer on Kay's private carrier station at Sierra Peak.

11. For the same reasons set forth in ¶¶ 6-7, above, the authorization for Station WII664 automatically terminated and became invalid years ago.

[5] Fischbeck continued to be a customer of Kay for approximately two years following the deactivation of the community repeater, and Kay is therefore intimately familiar with Fischbeck's land mobile radio operations during that time.

D. Station WII622 - FCC File No. 0000644810

12. Please see ¶ 8, above.

13. The license for IG Station WII622, issued to Charles and Cornelia Dray d/b/a Chino Hills Patrol ("Chino Hills Patrol"), authorized operation of a community repeater on the base station frequency 471.8875 MHz at Sunset Ridge. In October 1993 the customer accounts were sold to Kay by Motorola. {Ex. 7} This was part of the same arrangement whereby Kay also purchased the customers of Motorola's Saddle Peak and Sierra Peak community repeaters. See ¶¶ 5 & 9, above. On December 2, 1993, Chino Hills Patrol entered into a contract for, inter alia, service on 471.8875 MHz via Kay's via Kay's private carrier facility, Station WIH946, also located at Sunset Ridge. {Ex. 8} As part of these negotiations, Chino Hills Patrol agreed to cancel the community repeater license. Chino Hills Patrol executed an FCC Form 405A for that purpose on or about December 2, 1993.[6] {Ex. 9} At that point Chino Hills Patrol ceased operating on the Sunset Ridge community repeater, and Motorola in fact removed that repeater from the Sunset Ridge site late December 1993. The station was never reconstructed and Chino Hills Patrol has not, since that time, engaged in any operation pursuant to the license for WII622. Thus, on December 2, 1993, Chino Hills Patrol agreed to cancel its authorization, executed an FCC Form 405A requesting formal cancellation from the FCC, and in fact permanently discontinued use of the station.

14. As the owner of the repeater equipment at Sunset Ridge and as a co-channel licensee on 471.8875 MHz, Kay has personal knowledge of both the Sunset Ridge site and Los Angeles area operations on 471.8875 MHz. Kay definitively asserts, from his own personal knowledge, that Chino Hills Patrol has not at any time since December 1993: (a) reestablished

[6] It was tendered to the Commission on April 26, 1994 in connection with Kay's application in FCC File No. 0000415333.

the WII622 community repeater at Sunset Ridge, or (b) operated on 471. 8875 MHz in the same area except as a customer on Kay's private carrier system.

15. For the same reasons set forth in ¶¶ 6-7, above, the authorization for Station WII622 automatically terminated and became invalid years ago.

16. Chino Hills Patrol subsequently attempted to renege on its agreement with Kay, but on November 20, 1998, the Superior Court of the State of California ordered it to provide Kay with appropriate forms so that he could seek either assignment of the license or its cancellation. {Ex. 10} Thus, even if the authorization for Station WII622 were not defunct due to permanent discontinuance, it would not be Chino Hills Patrol's to assign. A court of competent jurisdiction has established Kay's rights and interest in the authorization, subject only to customary FCC action on an assignment of the license or its cancellation.

III. MISREPRESENTATION, LACK OF CANDOR, & ABUSE OF PROCESS

A. Misrepresentation and Lack of Candor

17. Misrepresentation is a false statement of material fact, while lack of candor is a concealment, evasion, or other failure to disclose a material fact. *Fox River Broadcasting, Inc.*, 93 FCC2d 127, 129, (1983). Lack of candor is the failure to be fully forthcoming as to all facts and information that may be decisionally significant to their applications. *Swan Creek Communications v. FCC*, 39 F 2d 1217, 1222 (D.C. Cir. 1994). The Commission "must demand candor from those who come before it and must refuse to tolerate deliberate misrepresentations." *Nick J. Chaconas*, 28 FCC 2d 231, 233 (1971), *citing FCC v. WOKO, Inc.*, 329 U.S. 223 (1946) and *WMOZ, Inc.*, 36 FCC 202 (1964), *aff'd* 3 FCC 2d 637 (1966). Even the misrepresentation or concealment of a collateral fact can be disqualifying, because the act of misrepresentation or concealment is more significant than the underlying facts. Indeed, it is the "willingness to deceive" that is most significant. *FCC v. WOKO, Inc.*, 329 U.S. 223, 227 (1946). Absolute

candor is perhaps the foremost prerequisite for a Commission licensees. *Catoctin Broadcasting Corp. of New York*, 2 FCC Rcd 2126 (Rev. Bd. 1987), aff'd in pertinent part, 4 FCC 2d 2553 (1989), recon. denied 4 FCC Rcd 6312 (1989).

18. As demonstrated in Section II, above, the licenses for Stations WIJ226, WII622, and WII664, each automatically terminated and became invalid as early as December 1993. The repeaters which had operated pursuant to these license prior to December 1993 were deactivated and removed from their respective sites. Facilities were never reconstructed pursuant to these licenses, and none of the licenses has operated on the previously authorized facility or any other facilities pursuant to these licenses. In short, each of these licenses has been invalid and no longer effective for several years.

19. Notwithstanding the defunct state of these licenses, Mobile Relay proceeded, in three separate assignment of license applications, to take assignment of the authorizations for its own benefit. As reflected in Table A, an assignment of license application with respect to Station WIJ226 was filed on August 16, 2001 (FCC File No. 0000562462), an assignment of license application with respect to Station WII664 was filed on September 7, 2001 (FCC File No. 0000586475), and an assignment of license application with respect to Station WII622 was filed on October 31, 2001 (FCC File No. 0000644810). Each of these applications was tendered to the Commission more than seven years after the subject license had automatically terminated.

20. In submitting these assignment applications, Mobile Relay was effectively representing that the license which is was seeking to take by assignment was valid. Indeed, in each of the applications listed in Table A, item 91 of FCC Form 600, which inquires whether the facilities are constructed and operational, is checked "YES." Abrams personally executed the application on behalf of the assignee in each application. At a minimum this constituted an egregious lack of candor with the Commission.

21. There can be no dispute that the subject of Mobile Relay's misrepresentation and lack of candor is material. There can be nothing more material to the merits of an assignment of license application than the validity of the license itself. And in each of the applications listed in Table A, it appears that Mobile Relay concealed the invalidity of the subject license, and indeed even falsely represented that it was valid.

22. If this occurred in a single, isolated instance and involved an assignee who was unfamiliar with the land mobile industry and FCC application procedures, the Commission might conclude that the assignee was an innocent dupe, scammed by the unscrupulous holder of a dead authorization. But here we see a consistent pattern of Mobile Relay repeating the same conduct numerous times within a short period of time.[7] Mobile Relay, Abrams, and their affiliates are long time players in the land mobile radio industry, and sophisticated and experienced in terms of FCC practice, holding numerous land mobile authorizations in various states. Further, Mobile Relay's base of operations is in the Los Angeles area, where Abrams lives and works, and it is therefore inconceivable that Abrams was unaware of the status of these community repeaters.

B. Abuse of Process

23. The Commission has explained: "The term 'abuse of process' is a very broad concept but generally can be defined as the use of a Commission process, procedure, or rule to achieve a result which that process, procedure, or rule was not designed or intended to achieve or, alternatively, use of such process, procedure, or rule in a manner which subverts the underlying intended purpose of that process, procedure, or rule." *Broadcast Renewal Applicants*, 3 FCC Rcd 5179, 5199 n.2 (1988). Abuse of process is serious willful misconduct "which directly threatens the integrity of the Commission's licensing processes," and it "will ... be

[7] As discussed in ¶ 4, above, Kay believes that similar circumstances exists as to the other five assignment applications listed in Table A.

considered as bearing on character." *Policy Statement on Character Qualifications in Broadcast Licensing*, 102 FCC 2d 1179, 1211 (1986).[8]

24. The conduct of Mobile Relay and Abrams also constitutes and abuse of the Commission's application processes. It patently clear that they have used the assignment of license application process to circumvent the effect and purpose of Sections 1.955(a)(3) and 90. 157 of the Commission's Rules, 47 C.F.R. §§ 1.955(a)(3) & 90.157. The Commission clearly intended by those provisions that licenses automatically expire and have not effect or validity once operations are permanently discontinued. The Commission further intended that there be a presumption of permanent discontinuance where a station in this particular service has not been operated for a period of one year. By submitting these assignment applications without disclosing the true status of the subject authorizations, Mobile Relay and Abrams clearly thwarted these regulations by attempting to use the assignment of license process to have the Commission unwittingly breathe new life into these long dead authorizations.

25. The automatic license cancellation provisions are not the only Commission regulations or policies desecrated by this malfeasance. If Mobile Relay desires to have the authority once reflected in these licenses, the proper route would be for it to submit an application for a new license. But Mobile Relay and Abrams know full well that in most, if not all, of these cases, they would face the obstacle of Section 90.313 of the Commission's Rules, 47 C.F.R. § 90.313, which precludes additional new authorizations on channels that are already fully loaded by other licensees.

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[8] Although the Character Policy Statement addresses the qualifications of broadcast applicants, they also set forth the analytical framework under which the Commission determines character qualifications of non-broadcast applicants. See *Western Telecommunications, Inc.*, 3 FCC Rcd 6405 (1988) (Character Policy Statement used to evaluate qualifications of microwave radio licensees); *A.S.D. Answer Service, Inc.*, 1 FCC Rcd (1986) (Character Policy Statement standards applied to a domestic public radio service application). "Accordingly, we will use the standards outlined in the Character Policy Statement as a guideline in this instance." *Mercury PCS II, LLC*, 12 FCC Rcd 18093 (WTB 1997), aff'd 15 FCC Rcd 9654 (2000).

26. Of course, in focusing on these specific regulations, the Commission should not lose sight of the fact that this type of conduct actually strikes at the very foundation of the entire licensing process, constituting a most serious breach of its integrity. The entire underlying basis for Title III regulation is the premise that the electromagnetic spectrum is a public resource—not private property—and that it may be used for limited periods of time and subject to specific regulatory constraints, only pursuant to a federally issued license. 47 C.F.R. § 301. The transfer of a license from one party to another is also one of the basic statutory underpinnings of radio regulations. 47 C.F.R. § 310(d). The misuse of the assignment of license application process to fraudulently acquire authority that ought not be issued thus strikes at the statutory core of the entire scheme of Title III of the Communications Act. It is thus an abuse of process of the most egregious nature.

IV. CONCLUSION & PRAYER FOR RELIEF

27. Based on all of the foregoing, there is a substantial and material question before the Commission whether Mobile Relay and Abrams have intentionally exhibited a lack of candor, made misrepresentations, and abused the Commission's procedures by knowingly filing assignment applications for dead licenses. The same is equally true, moreover, for each of the assignors in these applications.

WHEREFORE, it is requested that the Commission:

(a) initiate a complete and thorough investigation into this matter;

(b) hold in abeyance the processing of each and every pending application to which Mark Abrams, Mobile Relay Associates, Mobile Relay Associates, Inc., and/or any of their affiliates is a party, pending the outcome of the investigation;

(c) set aside the any recent grants of applications to which Mark Abrams, Mobile Relay Associates, Mobile Relay Associates, Inc., and/or any of their affiliates is a party, and hold action thereon in abeyance pending the outcome of the investigation;

(d) designate an evidentiary hearing to determine whether all such authorizations should be revoked and all such pending applications be denied because of the intentional misrepresentation, lack of candor, and abuse of process by Mark Abrams, Mobile Relay Associates, and Mobile Relay Associates, Inc.;

(e) make Kay a party to any such proceedings;

(f) take such other enforcement actions as the Commission may deem appropriate in the public interest, including, but not limited to, the imposition of forfeitures and the initiation of cease and desist proceedings.

Respectfully submitted on December 4, 2001,

JAMES A. KAY, JR.

By: Robert J Keller

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Telephone: 202-223-2100
Facsimile: 202-223-2121
Email: rjk@telcomlaw.com

Certificate of Service

I, Robert J. Keller, certify that on the date indicated above I caused a copy of this pleading to be sent by First Class USPS, postage prepaid, to:

Mr. Mark J. Abrams
15330 Vermont Avenue
PO Box 19
Paramount, California 90723

Robert J Keller

Robert J. Keller

ATTACHMENT A

ATTACHMENT A

Licenses Issued to Mark J. Abrams,
Mobile Relay Associates, or Mobile Relay Associates, Inc.
(per FCC ULS Database as of 12/4/2001)

#	Licensee	Svc	Call Sign
1	Mark J. Abrams	CM	PG1111512
2	Mark J. Abrams	HA	WA6DPB
3	Mark J. Abrams	ZA	WPSR596
1	Mobile Relay Associates	CD	WPOM427
2	Mobile Relay Associates	GB	KNIH390
3	Mobile Relay Associates	GO	KCU409
4	Mobile Relay Associates	GO	WPMH441
5	Mobile Relay Associates	GO	WPMH452
6	Mobile Relay Associates	GO	WPMH454
7	Mobile Relay Associates	GU	WPHS983
8	Mobile Relay Associates	GX	WPCE280
9	Mobile Relay Associates	GX	WPLU758
10	Mobile Relay Associates	GX	WPLU766
11	Mobile Relay Associates	GX	WPLU767
12	Mobile Relay Associates	GX	WPLU768
13	Mobile Relay Associates	GX	WPLU769
14	Mobile Relay Associates	GX	WPLU770
15	Mobile Relay Associates	GX	WPLU771
16	Mobile Relay Associates	GX	WPLU772
17	Mobile Relay Associates	GX	WPLX222
18	Mobile Relay Associates	GX	WPMC249
19	Mobile Relay Associates	GX	WXZ980
20	Mobile Relay Associates	IG	KNQ678
21	Mobile Relay Associates	IG	KNQ937
22	Mobile Relay Associates	IG	KS9400
23	Mobile Relay Associates	IG	KVH574
24	Mobile Relay Associates	IG	KWP438
25	Mobile Relay Associates	IG	KYJ582
26	Mobile Relay Associates	IG	WIB815
27	Mobile Relay Associates	IG	WIF528
28	Mobile Relay Associates	IG	WII345
29	Mobile Relay Associates	IG	WII622
30	Mobile Relay Associates	IG	WII664
31	Mobile Relay Associates	IG	WIJ226
32	Mobile Relay Associates	IG	WIL205
33	Mobile Relay Associates	IG	WPPF266
34	Mobile Relay Associates	IG	WPPF268
35	Mobile Relay Associates	IG	WPPF270
36	Mobile Relay Associates	IG	WPSR337

Licenses Issued to Mark J. Abrams,
Mobile Relay Associates, or Mobile Relay Associates, Inc.
(per FCC ULS Database as of 12/4/2001)

#	Licensee	Svc	Call Sign
37	Mobile Relay Associates	IG	WPSU395
38	Mobile Relay Associates	IG	WSD94
39	Mobile Relay Associates	QT	WPCX473
40	Mobile Relay Associates	QT	WPCX477
41	Mobile Relay Associates	YC	WPRQ800
42	Mobile Relay Associates	YC	WPRQ801
43	Mobile Relay Associates	YG	KNDZ379
44	Mobile Relay Associates	YG	KXK718
45	Mobile Relay Associates	YG	WIG828
46	Mobile Relay Associates	YG	WIK895
47	Mobile Relay Associates	YG	WPGX823
48	Mobile Relay Associates	YG	WPPE823
49	Mobile Relay Associates	YG	WPPE824
50	Mobile Relay Associates	YG	WPPF223
51	Mobile Relay Associates	YG	WPPF226
52	Mobile Relay Associates	YG	WPPF229
53	Mobile Relay Associates	YG	WPPF231
54	Mobile Relay Associates	YG	WPPF233
55	Mobile Relay Associates	YG	WPPF234
56	Mobile Relay Associates	YG	WPPF353
57	Mobile Relay Associates	YG	WPPF634
58	Mobile Relay Associates	YG	WPPG844
59	Mobile Relay Associates	YG	WPPY815
60	Mobile Relay Associates	YG	WPPY817
61	Mobile Relay Associates	YG	WPPY818
62	Mobile Relay Associates	YG	WPPZ602
63	Mobile Relay Associates	YG	WPQA973
64	Mobile Relay Associates	YG	WPQB766
65	Mobile Relay Associates	YG	WPQC332
66	Mobile Relay Associates	YG	WPQF246
67	Mobile Relay Associates	YG	WPSS692
68	Mobile Relay Associates	YG	WPST574
69	Mobile Relay Associates	YG	WPTF351
70	Mobile Relay Associates	YU	WPMC732
71	Mobile Relay Associates	YU	WPPF281
72	Mobile Relay Associates	YX	KNIV878
73	Mobile Relay Associates	YX	WNBQ920
74	Mobile Relay Associates	YX	WNCE488
75	Mobile Relay Associates	YX	WNRU242
76	Mobile Relay Associates	YX	WNXN898

Licenses Issued to Mark J. Abrams,
Mobile Relay Associates, or Mobile Relay Associates, Inc.
(per FCC ULS Database as of 12/4/2001)

#	Licensee	Svc	Call Sign
77	Mobile Relay Associates	YX	WNYS249
78	Mobile Relay Associates	YX	WNZI688
79	Mobile Relay Associates	YX	WPDV915
80	Mobile Relay Associates	YX	WPDV916
81	Mobile Relay Associates	YX	WPLU400
82	Mobile Relay Associates	YX	WPLU425
83	Mobile Relay Associates	YX	WPLU773
84	Mobile Relay Associates	YX	WPLU774
85	Mobile Relay Associates	YX	WPLV923
1	Mobile Relay Associates, Inc.	GB	WNAU414
2	Mobile Relay Associates, Inc.	GB	WNKM327
3	Mobile Relay Associates, Inc.	GB	WPEQ759
4	Mobile Relay Associates, Inc.	GB	WPLU738
5	Mobile Relay Associates, Inc.	GU	WNNL345
6	Mobile Relay Associates, Inc.	GU	WPEF986
7	Mobile Relay Associates, Inc.	GU	WPEP258
8	Mobile Relay Associates, Inc.	GU	WPKX315
9	Mobile Relay Associates, Inc.	GU	WPKX316
10	Mobile Relay Associates, Inc.	GU	WPMB946
11	Mobile Relay Associates, Inc.	GU	WPPW340
12	Mobile Relay Associates, Inc.	GX	KNHH521
13	Mobile Relay Associates, Inc.	GX	WPKM267
14	Mobile Relay Associates, Inc.	GX	WYY839
15	Mobile Relay Associates, Inc.	IG	KB92186
16	Mobile Relay Associates, Inc.	IG	WIB617
17	Mobile Relay Associates, Inc.	IG	WIL252
18	Mobile Relay Associates, Inc.	IG	WIL294
19	Mobile Relay Associates, Inc.	IG	WIL400
20	Mobile Relay Associates, Inc.	IG	WIL411
21	Mobile Relay Associates, Inc.	IG	WIL433
22	Mobile Relay Associates, Inc.	IG	WIL618
23	Mobile Relay Associates, Inc.	IG	WIL694
24	Mobile Relay Associates, Inc.	IG	WNNI307
25	Mobile Relay Associates, Inc.	MG	WNEY665
26	Mobile Relay Associates, Inc.	MG	WNEY666
27	Mobile Relay Associates, Inc.	MG	WNTK917
28	Mobile Relay Associates, Inc.	MG	WNTK918
29	Mobile Relay Associates, Inc.	MG	WPRW838
30	Mobile Relay Associates, Inc.	MG	WPRW840

Licenses Issued to Mark J. Abrams,
Mobile Relay Associates, or Mobile Relay Associates, Inc.
(per FCC ULS Database as of 12/4/2001)

#	Licensee	Svc	Call Sign
31	Mobile Relay Associates, Inc.	YD	KNNY387
32	Mobile Relay Associates, Inc.	YG	WIB791
33	Mobile Relay Associates, Inc.	YG	WII378
34	Mobile Relay Associates, Inc.	YG	WIK899
35	Mobile Relay Associates, Inc.	YG	WIL233
36	Mobile Relay Associates, Inc.	YG	WIL249
37	Mobile Relay Associates, Inc.	YG	WIL337
38	Mobile Relay Associates, Inc.	YG	WIL409
39	Mobile Relay Associates, Inc.	YG	WIL410
40	Mobile Relay Associates, Inc.	YG	WIL525
41	Mobile Relay Associates, Inc.	YG	WIL600
42	Mobile Relay Associates, Inc.	YG	WIL648
43	Mobile Relay Associates, Inc.	YG	WPHH415
44	Mobile Relay Associates, Inc.	YG	WPHH466
45	Mobile Relay Associates, Inc.	YG	WPLQ457
46	Mobile Relay Associates, Inc.	YG	WPLS563
47	Mobile Relay Associates, Inc.	YG	WPLS567
48	Mobile Relay Associates, Inc.	YG	WPLS570
49	Mobile Relay Associates, Inc.	YG	WPLS571
50	Mobile Relay Associates, Inc.	YG	WPLS581
51	Mobile Relay Associates, Inc.	YG	WPLV683
52	Mobile Relay Associates, Inc.	YG	WPMN542
53	Mobile Relay Associates, Inc.	YG	WPPE290
54	Mobile Relay Associates, Inc.	YG	WPPE292
55	Mobile Relay Associates, Inc.	YG	WPPE428
56	Mobile Relay Associates, Inc.	YG	WPPE567
57	Mobile Relay Associates, Inc.	YG	WPPE575
58	Mobile Relay Associates, Inc.	YG	WPPG553
59	Mobile Relay Associates, Inc.	YK	WIJ981
60	Mobile Relay Associates, Inc.	YK	WIK898
61	Mobile Relay Associates, Inc.	YU	WPHY281
62	Mobile Relay Associates, Inc.	YU	WPIK370
63	Mobile Relay Associates, Inc.	YU	WPIK371
64	Mobile Relay Associates, Inc.	YU	WPMB737
65	Mobile Relay Associates, Inc.	YX	KNNT449
66	Mobile Relay Associates, Inc.	YX	WNCD872
67	Mobile Relay Associates, Inc.	YX	WYY828