

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

In the Matter of)
) WT Docket No. 05-149
Sungilt Corporation, Inc.) Report No. AUC-58
)
Application for Broadband)
PCS Licenses for Bryan-College Station, TX)
Longview, WA)
Portland, OR)

To: Secretary
Attn.: Chief, Wireless Telecommunications Bureau

OPPOSITION TO PETITION TO DENY

Sungilt Corporation, Inc. (“Sungilt”), by its counsel and pursuant to Section 1.2108(c) of the Commissions’s Rules, 47 C.F.R. § 1.2108 (c), hereby opposes the Petition to Deny dated March 10, 2005, filed by Ameer Flippin (“Petition”).¹

The Petition suffers from numerous procedural defects. However, the Commission need not address the Petition’s procedural defects, because it is substantively deficient and fatally flawed. The Petition fails to make any allegation that Sungilt, or any other applicant, is not qualified to be a licensee. Instead, the Petition merely alleges improper treatment of the Petitioner by the Commission and others. The Petition fails to present any factual or legal basis for denying Sungilt’s application. Therefore, the Petition should be dismissed or denied.

¹Ex-parte Motion and Petition to Deny Against All Long-form Applications of Opposing Entities Which Placed Bids Less Than or Equal to in Value of Bids Placed by Ameer Flippin, an Individual, in Auction #58, in Accordance with 47 CFR L.1208,” dated March 10, 2005.

Respectfully submitted,

SUNGILT CORPORATION, INC.



James L. Winston

**RUBIN, WINSTON, DIERCKS, HARRIS
& COOKE**

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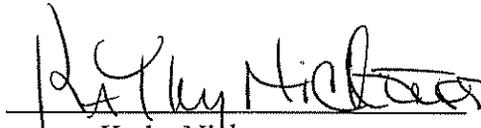
(202) 861-0870

April 11, 2005

CERTIFICATE OF SERVICE

I, Kathy Nickens, a secretary in the law firm of Rubin, Winston, Diercks, Harris & Cooke, L.L.P., do hereby certify that on April 11, 2005, true copies of the foregoing "Opposition to Petition to Deny" were mailed, first class U.S. mail, postage pre-paid to the following:

Ameer Flippin
2053 Wilson Road
Memphis, TN 38116


Kathy Nickens

April 11, 2005