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May 13, 2005

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800 MHz Transition Administrator
c/o Robert B. Kelly, Esq.
Squire, Sanders & Dempsey L.L.P.
1201 Pennsylvania Ave., N.W.
P.O. Box 407
Washington, DC 20044-0407

**RE: 800 MHz EA Election
AIRPEAK Communications, LLC**

Dear Mr. Kelly:

The April 21, 2005 Press Release from the 800 MHz Transition Administrator ("TA") directs Economic Area ("EA") Specialized Mobile Radio ("SMR") licensees in the 800 MHz band to submit their elections for relocation of their licenses by May 13, 2005. As you know, AIRPEAK Communications, LLC ("AIRPEAK") holds a number of EA licenses and submitted its 800 MHz Enhanced Specialized Mobile Radio ("ESMR") election with the TA on January 24, 2005, as supplemented on April 13, 2005 ("ESMR Election").

AIRPEAK herein reaffirms its position that it is an ESMR licensee with full authority to relocate EA and identified site-based stations to the ESMR Band, consistent with the rules set out in the Federal Communications Commission ("FCC") Orders relating to 800 MHz Rebanding, including the definition of an ESMR as set out in FCC Rule Section 90.7.¹ AIRPEAK already has constructed a system having more than five overlapping interactive sites with hand-off capability and at least one such site with an antenna height of less than 30.4 meters (100 ft.) above ground level and an HAAT of less than 152.4 meters (500 ft.) and 20 or more paired

¹ *Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order, and Order*. WT Docket No. 02-55, 19 FCC Rcd 14969 (2004) ("800 MHz Order"); *Supplemental Order and Order on Reconsideration*, WT Docket No. 02-55, 19 FCC Rcd 25120 (2004) ("Supplemental Order"); 47 C.F.R. § 90.7.

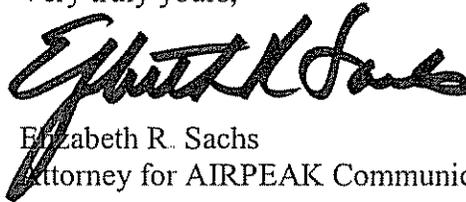
Robert B. Kelly, Esq.
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frequencies as described in its ESMR Election. It is operating an ESMR system and will continue to do so when relocated to the ESMR Band.

Because AIRPEAK already has submitted its ESMR Election, it is not obligated also to submit the instant EA Election. However, as Nextel has challenged AIRPEAK's ESMR Election at the FCC, and pending TA and FCC confirmation of AIRPEAK's ESMR status as described in its ESMR Election, out of an abundance of caution AIRPEAK also is submitting the instant EA Election to relocate the EA licenses listed on Attachment A to the ESMR Band. The certification accompanying the election is not notarized, but conforms to the requirements of FCC Rule Section 1.16.

Undersigned counsel is the contact for purposes of this filing.

Very truly yours,

A handwritten signature in black ink, appearing to read "Elizabeth R. Sachs". The signature is written in a cursive, flowing style.

Elizabeth R. Sachs
Attorney for AIRPEAK Communications, LLC

Enclosures

AIRPEAK Economic Area Licenses

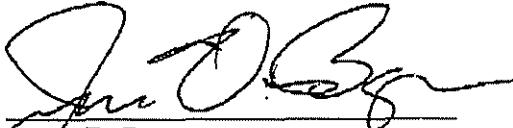
| EA | Block | FCC Callsign | Economic Area Name |
|---------|-------|-----------------|---------------------------|
| BEA094 | D | WPRQ904 | Springfield, Missouri |
| BEA094 | FF | WPRQ934 | Springfield, Missouri |
| BEA0136 | FF | WPRQ935 | Hobbs, New Mexico |
| BEA0138 | F | WPRQ926 | Amarillo, Texas |
| BEA0138 | FF | WPRQ936 | Amarillo, Texas |
| BEA0139 | D | WPRQ905 | Santa Fe, New Mexico |
| BEA0139 | DD | WPRQ912 | Santa Fe, New Mexico |
| BEA0139 | F | WPRQ927 | Santa Fe, New Mexico |
| BEA0139 | FF | WPRQ937 | Santa Fe, New Mexico |
| BEA0147 | D | WPRQ908 | Spokane, Washington |
| BEA0147 | DD | WPRQ914 | Spokane, Washington |
| BEA0147 | I | WPSA408 | Spokane, Washington |
| BEA0147 | K | WPSA412 | Spokane, Washington |
| BEA0147 | L | WPSA415 | Spokane, Washington |
| BEA0147 | M | WPSA417 | Spokane, Washington |
| BEA0147 | N | WPSA418 | Spokane, Washington |
| BEA0148 | E | WPRQ918 | Idaho Falls, Idaho |
| BEA0148 | EE | WPRQ924 | Idaho Falls, Idaho |
| BEA0151 | E | WPRQ919 | Reno, Nevada |
| BEA0151 | K | WPSA413 | Reno, Nevada |
| BEA0151 | L | WPSA416 | Reno, Nevada |
| BEA0151 | P | WPSA419 | Reno, Nevada |
| BEA0151 | Q | WPSA421 | Reno, Nevada |
| BEA0151 | R | WPSA423 | Reno, Nevada |
| BEA0151 | S | WPSA427 | Reno, Nevada |
| BEA0151 | T | WPSA431 | Reno, Nevada |
| BEA0151 | U | WPSA434 | Reno, Nevada |
| BEA0151 | V | WPSA435 | Reno, Nevada |
| BEA0153 | D | WPRQ909 | Las Vegas, Nevada |
| BEA0154 | D | WPRQ910 | Flagstaff, Arizona |
| BEA0154 | FF | WPRQ938 | Flagstaff, Arizona |
| BEA0155 | FF | WPRQ939 | Farmington, New Mexico |
| BEA0156 | F | WPRQ929 | Albuquerque, New Mexico |
| BEA0156 | FF | WPRQ940 | Albuquerque, New Mexico |
| BEA0157 | D | WPRQ911 | El Paso, Texas |
| BEA0157 | DD | WPRQ915 | El Paso, Texas |
| BEA0157 | E | WPRQ920 | El Paso, Texas |
| BEA0162 | S | WPSA428 | Fresno, California |
| BEA0163 | S | WPSA429 | San Francisco, California |
| BEA0164 | I | WPSA409 | Sacramento, California |
| BEA0164 | P | WPSA420 | Sacramento, California |
| BEA0164 | R | WPSA424 | Sacramento, California |
| BEA0165 | R | WPSA425 | Redding, California |
| BEA0166 | F | WPRQ930 | Eugene/Medford, Oregon |
| BEA0167 | Q | WPSA422 | Portland, Oregon |
| BEA0167 | T | WPSA432 | Portland, Oregon |
| BEA0167 | R | WPSA426 | Portland, Oregon |
| BEA0168 | E | WPRQ921 | La Grande/Pendle, Oregon |
| BEA0168 | F | WPRQ931 | La Grande/Pendle, Oregon |
| BEA0169 | E | WPRQ922 | Kennewick, Washington |
| BEA0169 | F | WPRQ932 | Kennewick, Washington |
| BEA0171 | DD | WPRQ916 | Anchorage, Alaska |
| BEA0171 | E | WPRQ923 | Anchorage, Alaska |
| BEA0171 | EE | WPRQ925 | Anchorage, Alaska |
| BEA0171 | F | WPRQ933 | Anchorage, Alaska |

CERTIFICATION

I, James D. Boyer, certify under penalty of perjury that the following is true and correct:

1. I am the managing member of AIRPEAK Communications, LLC.
2. I have reviewed the EA Election of AIRPEAK Communications, LLC and any materials associated therewith.
3. The information provided in the foregoing EA Election is true and correct.

Executed on 5/12/05



James D. Boyer