

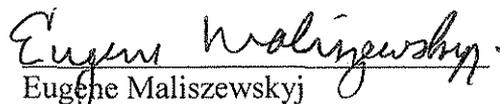
ATTACHMENT B

ENGINEERING STATEMENT OF EUGENE MALISZEWSKYJ

Engineering Statement

I, Eugene Maliszewskyj, hereby certify as follows:

1. I am employed as Director of Engineering for the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP in Washington, DC. I have over 35 years of experience in telecommunications and radio frequency engineering.
2. I hold a Bachelor of Science degree in Electrical Engineering from Villanova University and have worked as an Electronics Engineer at the Federal Communications Commission ("FCC"), in the predecessor office of the current Wireless Telecommunications Bureau.
3. I have prepared or supervised the preparation of the technical portions of numerous applications and engineering showings filed with the FCC. I am familiar with the relevant portions of the FCC's Rules.
4. I have prepared or supervised the preparation of the attached analysis of the impact of a 70 percent geographic coverage requirement on certain Cellular Market Areas as contemplated by FCC Rule Section 27.14 (g), as revised by the Commission's Second Report and Order, FCC 07-132, released August 10, 2007.


Eugene Maliszewskyj

Dated: September 24, 2007

The Engineering Department of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP has studied various rural Cellular Market Areas (“CMAs”) to examine the feasibility of satisfying the requirement in revised FCC Rule Section 27.14(g) that a market area licensee must provide coverage to at least 70 percent of the geographic area of the CMA. In particular, we looked at the population characteristics of a sampling of CMAs, and found that there are several markets in which it will be possible to provide a reliable signal to the vast majority of the population using cell sites that provide coverage to only a small portion of the CMA’s geographic area. For example:

It is possible to cover 72 percent of the population of the Nevada 1-Humboldt RSA (CMA 543) with transmitters providing a reliable signal over only 2.3 percent of the total land area of the market area.

It is possible to cover 74.3 percent of the population of the Nevada 2-Lander RSA (CMA 544) with transmitters providing a reliable signal over only 7 percent of the total land area of the market area.

It is possible to cover 72.7 percent of the population of the Nevada 4-Mineral RSA (CMA 546) with transmitters providing a reliable signal over only 6 percent of the total land area of the market area.

It is possible to cover 75 percent of the population of the Nevada 5-White Pine RSA (CMA 547) with transmitters providing a reliable signal over only 5.8 percent of the total land area of the market area.

It is possible to cover 70.6 percent of the population of the North Dakota 1-Divide RSA (CMA 580) with transmitters providing a reliable signal over only 8.2 percent of the total land area of the market area.

It is possible to cover 78.6 percent of the population of the Wyoming 1-Park RSA (CMA 718) with transmitters providing a reliable signal over only 7.5 percent of the total land area of the market area.

It is possible to cover 75.3 percent of the population of the Wyoming 2-Sheridan RSA (CMA 719) with transmitters providing a reliable signal over only 6.3 percent of the total land area of the market area.

It is possible to cover 75 percent of the population of the Wyoming 4-Niobrara RSA (CMA 721) with transmitters providing a reliable signal over only 6.7 percent of the total land area of the market area.

It is possible to cover 87 percent of the population of the Wyoming 5-Converse RSA (CMA 722) with transmitters providing a reliable signal over only 16.3 percent of the total land area of the market area.

These calculations were made utilizing a 40 dBu signal contour to depict a reliable signal, consistent with Rule Section 27.55(a)(2), which is a stronger signal (and thus more of a “worst case scenario”) than the 32 dBu contour embodied in Rule Section 22.911(a)(1) for determining a reliable cellular signal. Population calculations were made using RadioSoft ComStudy v.2.2 population counting software.

The above findings, which are explained in greater detail below and in the attached contour plots, represent a sampling of CMAs, and not an exhaustive review of all CMAs. In general, we observed that the above results could often be explained by the presence of difficult terrain/climate features that appears to have constrained human habitation of and travel to large portions of the CMAs. Based on the above findings, it is reasonable to conclude that in many cases, it will be extremely expensive, for a disproportionately low gain of useful coverage, if a licensee must complete coverage to 70 percent of the geographic area of a rural CMA.

Nevada 1 – Humboldt RSA

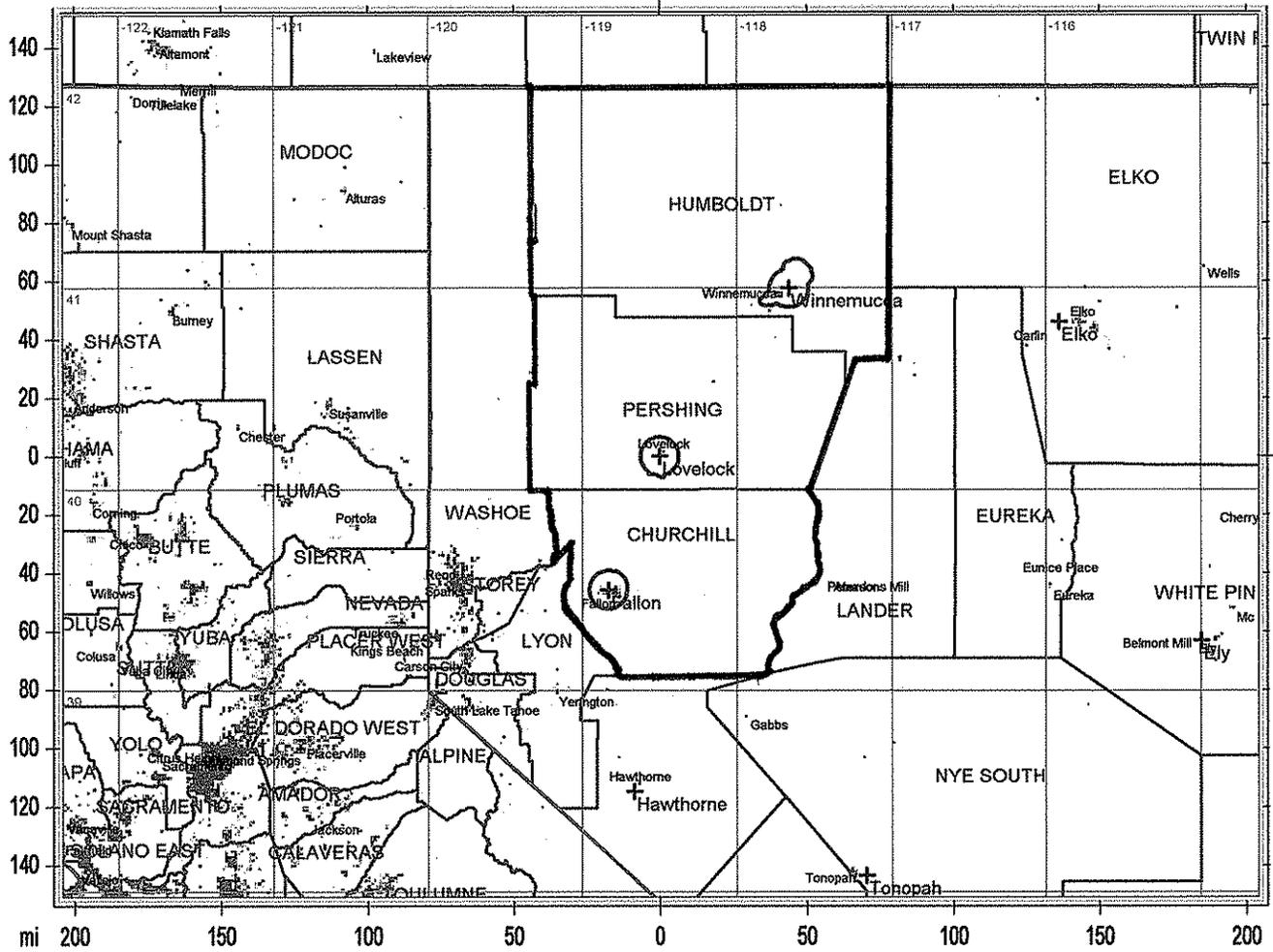
The Nevada 1 – Humboldt RSA consists of the counties of Humboldt, Pershing and Churchill, NV.

Using the 2000 Census, the population of Nevada 1 is 46,781 persons.

Using sites at Fallon, Lovelock and Winnemucca (100 watts ERP), the population covered is 33,649 persons (72%).

The total land area covered within the Nevada 1 – Humboldt RSA is 20,613.5 square miles. The total land area covered by the 40 dBu contours at Fallon, Lovelock and Winnemucca is 482.6 square miles (2.3% of the total land area of the RSA).

Nevada 1 - Humboldt



Map Footer



County Borders
 State Borders
 Lat/Lon Grid

Nevada 2 – Lander RSA

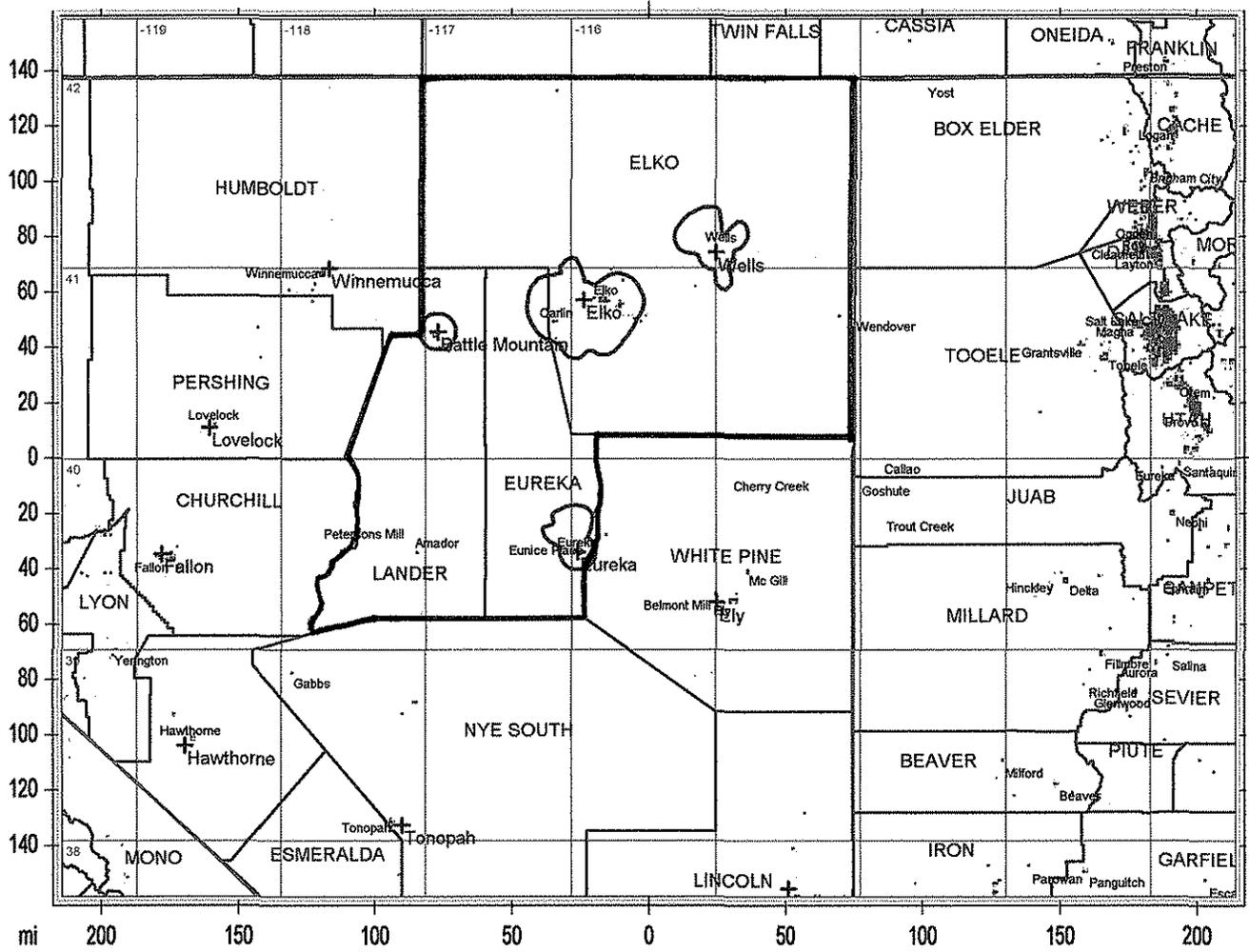
The Nevada 2 – Lander RSA consists of the counties of Lander, Eureka and Elko, NV.

Using the 2000 Census, the population of Nevada 2 is 52,736 persons.

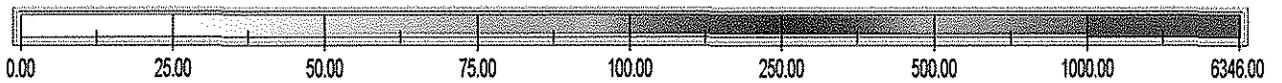
Using sites at Elko, Battle Mountain, Eureka and Wells (100 watts ERP), the population covered is 39,189 persons (74.3%).

The total land area covered within the Nevada 2 – Lander RSA is 26,848.3 square miles. The total land area covered by the 40 dBu service area contours is 1,897.5 square miles (7% of the total land area of the RSA).

Nevada 2 - Lander



Population and Land Area



County Borders State Borders Lat/Lon Grid

Nevada 4 – Mineral RSA

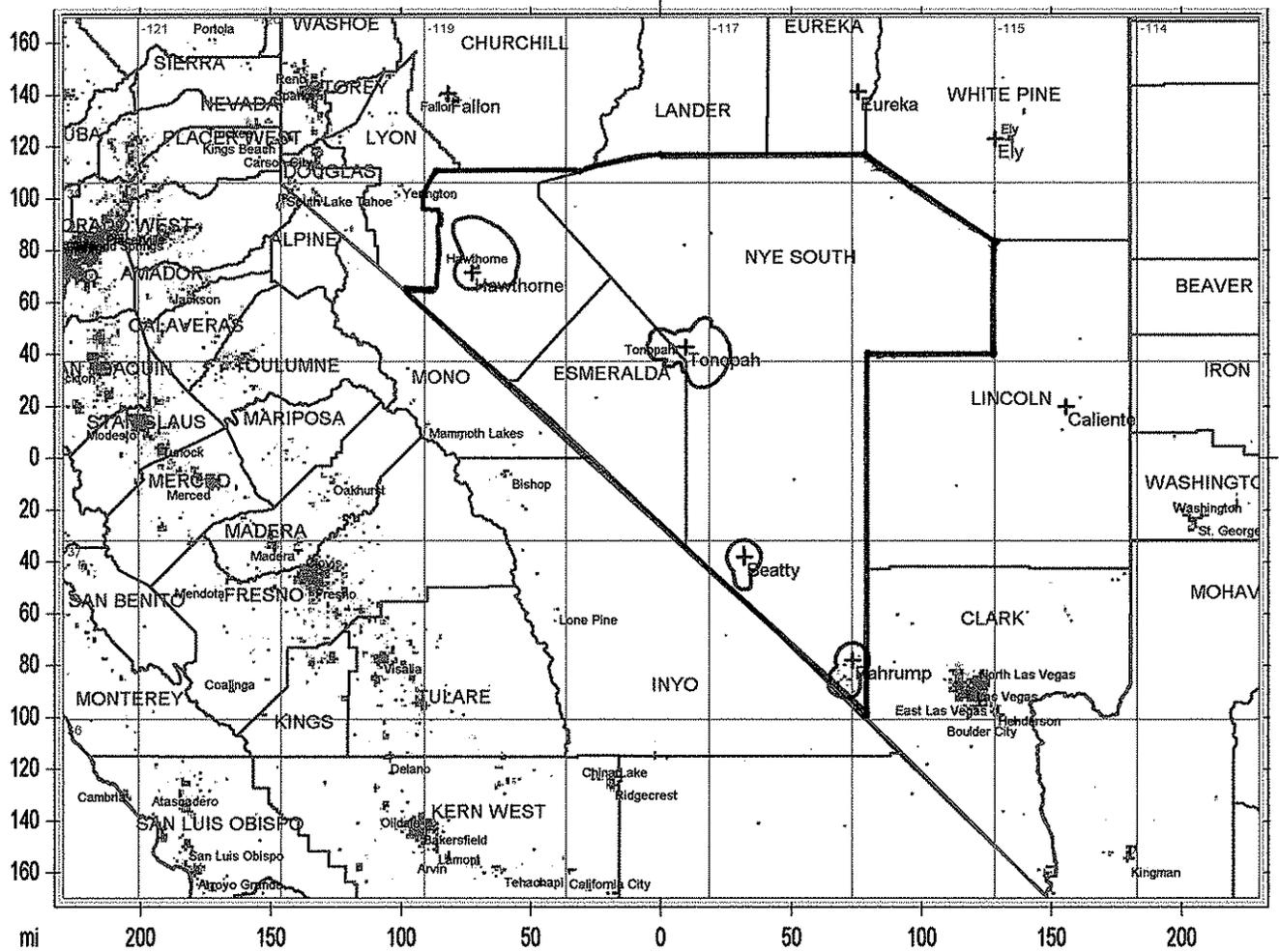
The Nevada 4 – Mineral RSA consists of the counties of Mineral, Esmeralda & Nye South, NV.

Using the 2000 Census, the population of Nevada 4 is 38,527 persons.

Using a sites at Tonopah, Pahrump, Beatty and Hawthorne (100 watts ERP), the population covered is 28,001 persons (72.7%).

The total land area covered within the Nevada 4 – Mineral RSA is 24,491.5 square miles. The total land area covered within the 40 dBu service area contours is 1,479.6 square miles (6% of the total land area of the RSA).

Nevada 4 - Mineral



Population and Land Area



County Borders
 State Borders
 Lat/Lon Grid

Nevada 5– White Pine RSA

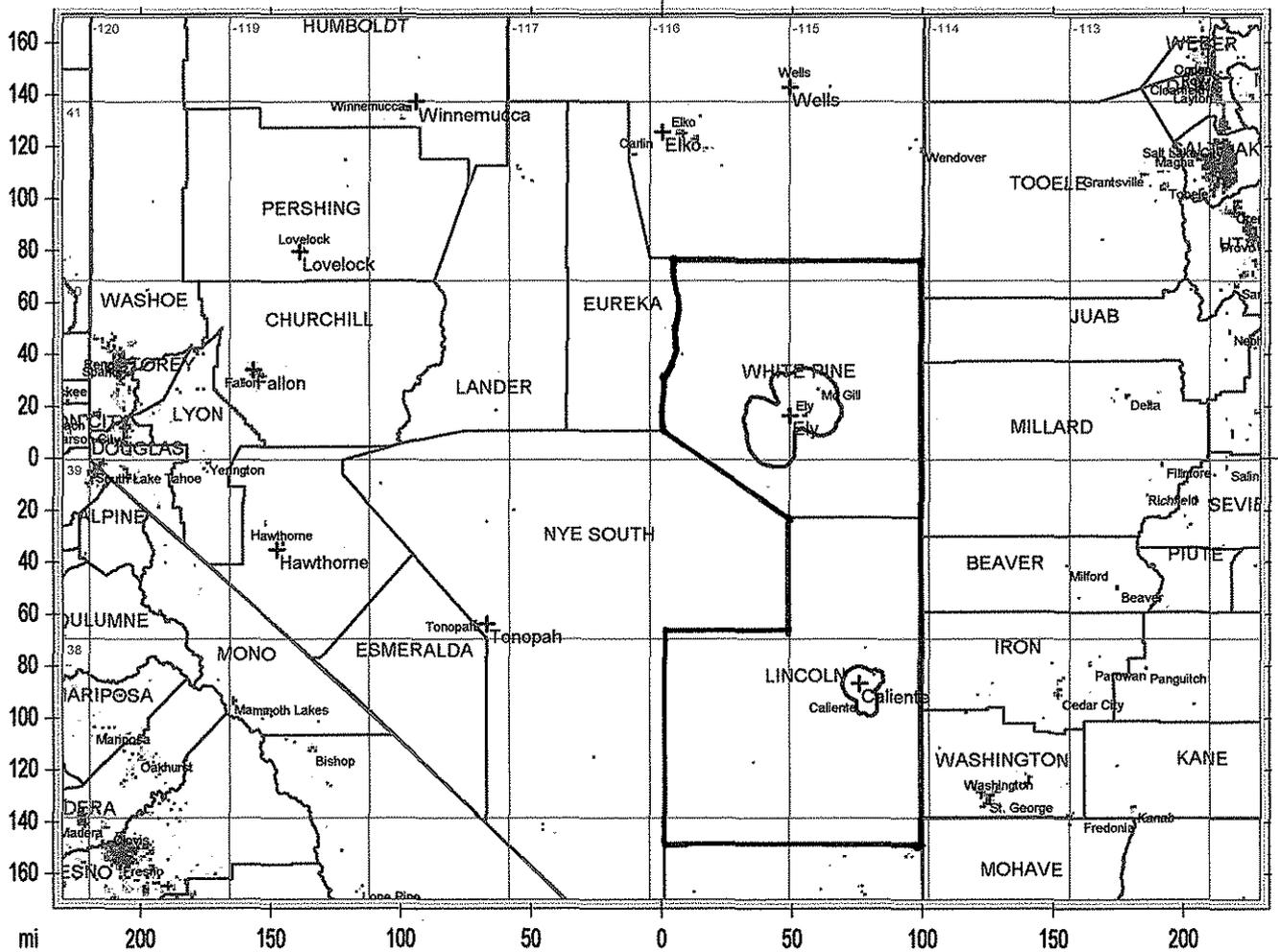
The Nevada 5 – White Pine RSA consists of the counties of White Pine & Lincoln, NV.

Using the 2000 Census, the population of Nevada 5 is 13,346 persons.

Using a sites at Ely and Caliente (100 watts ERP), the population covered is 10,104 persons (75%).

The total land area covered within the Nevada 5 – White Pine RSA is 19,539.6 square miles. The total land area covered within the 40 dBu contours at Ely and Caliente is 1,139.1 square miles (5.8% of the total land area of the RSA).

Nevada 5 - White Pine



Map Footer



County Borders
 State Borders
 Lat/Lon Grid

North Dakota 1 – Divide RSA

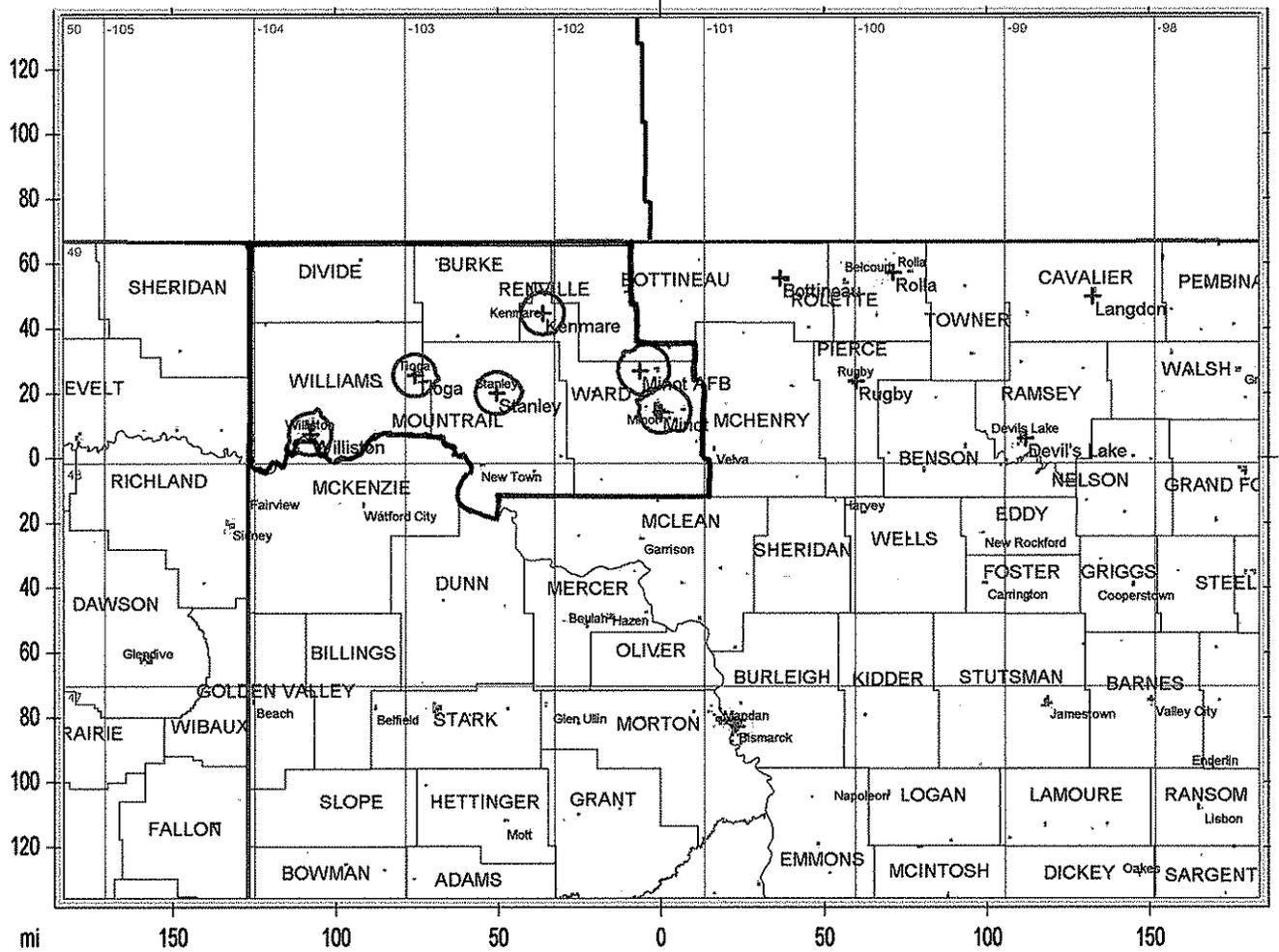
The North Dakota 1 – Divide RSA consists of the counties of Divide, Williams, Mountrail, Burke, Renville, McLean and Ward, ND.

Using the 2000 Census, the population of North Dakota 1 is 101,633 persons.

Using a sites at Williston, Minot, Kenmare, Tioga, Stanley and Minot AFB (100 watts ERP), the population covered is 71,792 persons (70.6%).

The total land area covered within the North Dakota 1 – Divide RSA is 11,255 square miles. The total land area covered within the 40 dBu service area contours is 928.1 square miles (8.2% of the total land area of the RSA).

ND 1 - Divide



Population and Land Area Covered



- National Borders
- County Borders
- State Borders
- Lat/Lon Grid

Wyoming 1 – Park RSA

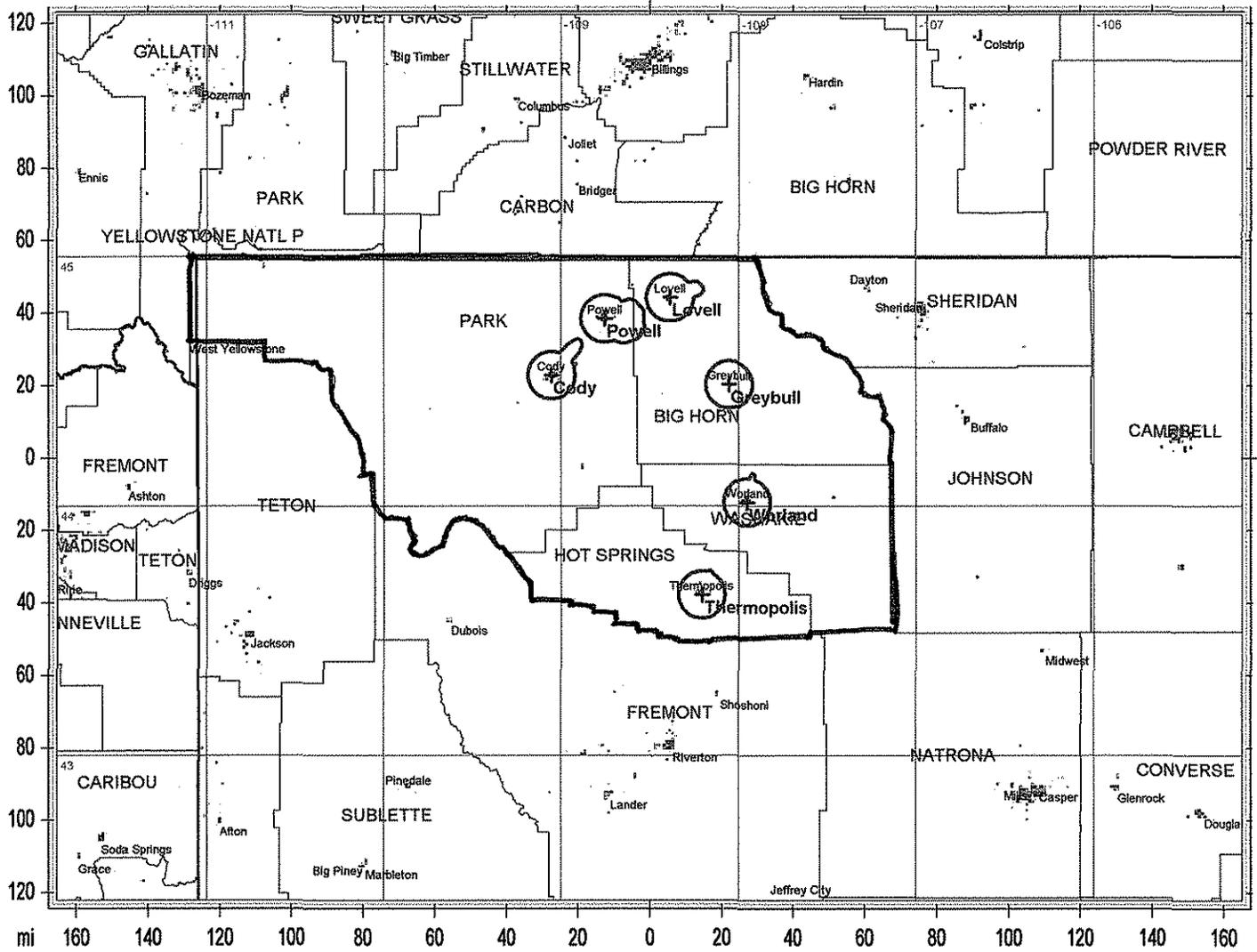
The Wyoming 1 – Park RSA consists of the counties of Park, Big Horn, Hot Springs and Washakie, WY.

Using the 2000 Census, the population of Wyoming 1 is 50,418 persons.

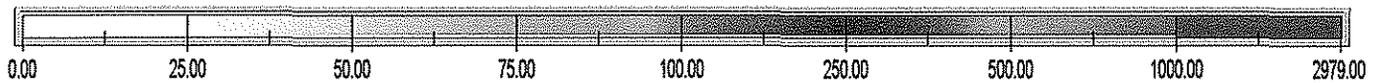
Using a sites at Powell, Cody, Worland, Lovell, Greybull and Thermopolis (100 watts ERP), the population covered is 39,636 persons (78.6%).

The total land area covered within the Wyoming 1 – Park RSA is 12,083.273 square miles. The total land area covered within the 40 dBu service area contours is 895.2 square miles (7.5% of the total land area of the RSA).

Wyoming 1 - Park



Population and Land Area Covered



County Borders State Borders Lat/Lon Grid

Wyoming 2 – Sheridan RSA

The Wyoming 2 – Sheridan RSA consists of the counties of Sheridan, Johnson, Campbell, Crook and Weston, WY.

Using the 2000 Census, the population of Wyoming 2 is 79,864 persons.

Using a sites at Sheridan, Gillette, Sundance, Newcastle and Buffalo (100 watts ERP), the population covered is 60,127 persons (75.3%).

The total land area covered within the Wyoming 2 - Sheridan RSA is 16,742.808 square miles. The total land area covered within the 40 dBu service area contours is 1,059.5 square miles (6.3% of the total land area of the RSA).

Wyoming 4 – Niobrara RSA

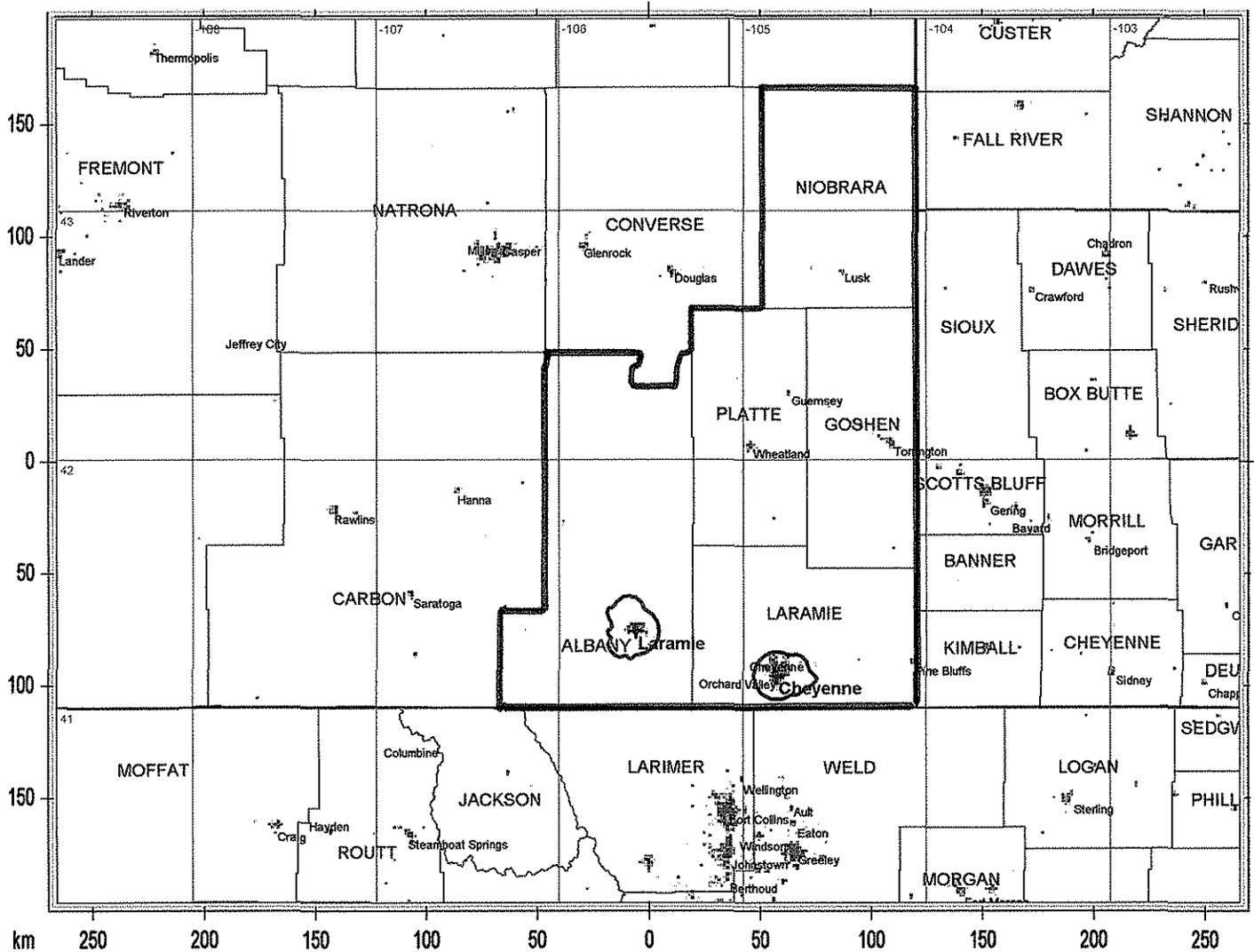
The Wyoming 4 – Niobrara RSA consists of the counties of Albany, Platte, Laramie, Niobrara and Goshen, WY.

Using the 2000 Census, the population of Wyoming 4 is 137,373 persons.

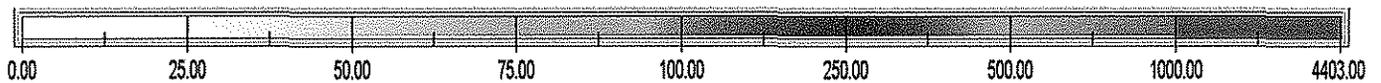
Using a sites at Laramie and Cheyenne (100 watts ERP), the population covered is 103,502 persons (75%).

The total land area covered within the Wyoming 4 – Niobrara RSA is 13,894.868 square miles. The total land area covered within the 40 dBu service area contours is 927.6 square miles (6.7% of the total land area of the RSA).

Wyoming 4 - Niobara



Population and Land Area Covered



County Borders State Borders Lat/Lon Grid

Wyoming 5 – Converse RSA

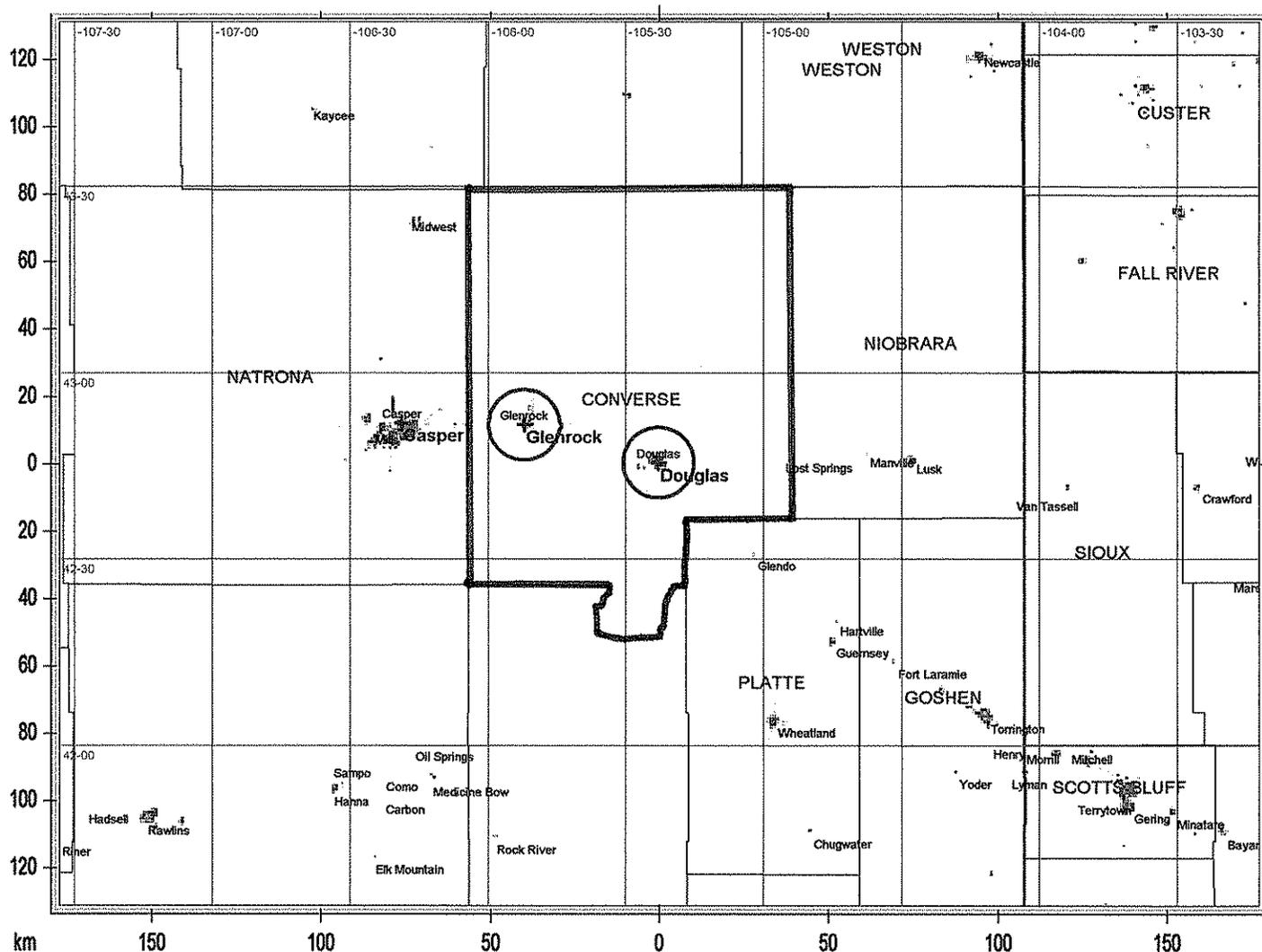
The Wyoming 5– Converse SA consists of the county of Converse, WY.

Using the 2000 Census, the population of Wyoming 5 is 12,052 persons.

Using a sites at Douglas and Glenrock (100 watts ERP), the population covered is 10,503 persons (87%).

The total land area covered within the Wyoming 5 - Converse RSA is 4,254.721 square miles. The total land area covered within the 40 dBu service area contours is 695 square miles (16.3% of the total land area of the RSA).

Wyoming 5 - Converse



Population and Land Area Covered



County Borders State Borders Lat/Lon Grid